

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 0, 1, 2, 15 and 18 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment)	ET Docket No. 15-170
)	
Request for the Allowance of Optional Electronic Labeling for Wireless Devices)	RM-11673
)	

COMMENTS OF LECTROSONICS, INC.

Lectrosonics, Inc. respectfully submits these Comments in response to the Commission’s *Notice of Proposed Rulemaking* in the above captioned Docket 15-170 proceeding.¹

I. Introduction

Lectrosonics, Inc. is a manufacturer of professional wireless microphone and IFB (interruptible fold-back) cueing and control systems used in TV production, filmmaking, and live sound performances. For over 30 years Lectrosonics has designed and certified equipment operating under Part 74 and Part 15 rules for both licensed and unlicensed uses.

Lectrosonics supports the Commission’s goal of simplifying and streamlining the equipment authorization program in response to the rapid evolution of RF technology.

II. The “electrically identical benchmark in 47 C.F.R §2.1043 should be replaced with a new standard

The Commission proposes that the “electrically identical” benchmark in 47 C.F.R. §2.1043 should be replaced with a new standard which considers how the device differs from what was evaluated at the time of equipment certification.² Changes in layout, components, operating software or variations in overall electrical or mechanical construction that do not substantially change the overall function of the device would be allowed without requiring a new

¹ *Amendment of Parts 0, 1, 2, 15 and 18 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment*, GN Docket No. 15-170, Notice of Proposed Rulemaking, FCC 15-92 (rel. July 21, 2015).

² *Id.* at para. 51.

FCC ID. The Commission also proposes to continue to permit Class I permissive changes that do not degrade the device parameters reported in an equipment authorization application, and that manufacturers could make such changes without notifying the Commission or a TCB.³ Lectrosonics strongly supports these proposed changes.

These changes would make it easier for us to react to supply chain problems or make improvements to products already certified. An example would be modifying a circuit to replace a component that has become unavailable with a substitute. In some cases this may even require layout changes to accommodate a substitute with a different size or “pinout”. Another example would be minor changes made to eliminate bugs or annoyances reported by users. Such changes would be classified as Class I permissive changes because they would not degrade the device parameters reported in the equipment authorization application.

III. The concept of a “family of products” certified under a single FCC ID should be recognized

The Commission proposes to recognize the concept of a “family of products” existing under a single FCC ID covering similar devices which are not strictly electrically identical but are functionally similar, being variations of a single device.⁴ Lectrosonics enthusiastically supports this change.

We have long produced wireless microphone products designed to tune over only a portion of the allowable frequency range (a frequency “block”) to maximize electrical performance. The result is a series of models, one for each frequency block, distinguished only by small Bill of Material differences related to tuned circuit component values. Currently a separate FCC ID is required for each model (one per block) so multiple applications are required, multiplying the administrative burden and filing fees incurred. In our opinion this is clearly a case of a “family of products” for which a single FCC ID should be sufficient.

³ *Id.* at para. 53.

⁴ *Id.* at para. 55.

IV. Long-term confidentiality should be automatic in certification applications

The Commission proposes to provide long-term confidentiality automatically in certification applications.⁵ This would apply to schematics, block diagrams, operational descriptions, parts lists and tune-up information. Lectrosonics supports this proposal.

We routinely request long-term confidentiality to protect trade secrets. Making this automatic removes the risk that an inadvertent failure to include the request letter in an application results in disclosure of confidential information. Our industry is very competitive and leaks of trade secrets can greatly reduce the return on the research and development investment we make in a new product.

Respectfully submitted,

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October 6, 2015

⁵ *Id.* at para. 88.