

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

REPLY COMMENTS OF INTEL CORPORATION

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I. Introduction

Intel Corporation (“Intel”) respectfully submits these reply comments to the above referenced proceeding to amend the rules regarding authorization of radio frequency equipment. Intel is a leader in designing and building the essential technologies that serve as the foundation for the world's computing and communications devices and as such we strongly support government policies that foster innovation and technology growth. In general Intel and the commenters strongly supported the Commission's proposed reforms, for example, those regarding e-labeling and modular approval, as well as the KDB process. In this Reply Comment Intel particularly underscores the importance of and the broad record support for reforming the Form 740 process.

II. Industry Responses Demonstrate Broad Interest To Reform Importation Requirements Beyond Elimination Of Forum 740.

Several Industry responses mirrored Intel's recommendation to streamline the importation process well beyond simply eliminating Form 740. For example, the Telecommunications Industry Association (TIA) writes “TIA Supports the Commission’s Proposals to Eliminate Form 740, but Believes Additional Steps are Needed to Achieve a Meaningful Reduction in Overall Administrative Burdens.”¹ They further state “In general, TIA is of the view that compliance at the point of entry into the United States

¹ Comments of the TIA to FCC 15-170

should be a self-regulating activity. To this end, the Commission should simply remove § 2.1203 in its entirety...”² Intel supports this view, and re-iterates our overall recommendations.³ In particular, we recommend eliminating 2.1203 and moving to a periodic, self-reporting scheme. Intel’s recommendation is supported by the Wi-Fi Alliance. In their comments, the Wi-Fi Alliance states, “...permit importers to maintain their own records and generate documents on a semi-annual basis, or by request.”⁴

We believe that the current order to suspend the FCC Form 740 transactional reporting requirements⁵ presents an opportunity to pilot a periodic, self-reporting model. Specifically, the FCC’s temporary elimination of CFR title 47, part 2.1203 and part 2.1205 from July 1, 2016 to December 31, 2016, and reliance on a self-reporting model provides an excellent opportunity to demonstrate the benefits of permanently extending this approach. Moreover, the suspension period also provides the Commission with the opportunity to synchronize Customs and Border Protection’s (CBP) current importation requirements in order to leverage the importation data already collected by CBP. The Information Technology Industry Council (ITI) in its comment recommends that the Commission “work with CBP to streamline transactional reporting requirements.”⁶ The Form 740 suspension period provides the Commission an opportunity to conduct this activity along with determining how it can

² Ibid

³ See Intel comments to 15-170

⁴ See Wi-Fi Alliance comments to 15-170

⁵ FCC 15-135, Order to Suspend Form 740

⁶ See ITI Comments to 15-170

leverage existing CBP trusted trader programs. We recommend closely monitoring the participants of the Customs-Trade Partnership Against Terrorism (CTPAT) and Importer Self-Assessment (ISA) programs who can be part of a future preferred partner program.

III. Conclusion

Intel commends the FCC for making positive strides toward reducing the administrative burden on manufacturers and importers, however, we urge the Commission to make further refinements to maximize consumer benefit from new technologies and maintain US leadership in technology innovation.

Respectfully submitted,

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