

Before the Federal Communications Commission
Washington, D.C. 20554

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

ANSI ASC C63 REPLY COMMENTS

American National Standards Institute Accredited Standards Committee C63[®] (“ASC C63”) hereby submits these reply comments in the above-captioned proceeding.¹ Although other commenters generally agree (or do not oppose) the positions set forth in ASC 63’s Comments, ASC C63 wishes to address a few of the issues related to ANSI measurement standards and related matters.

Use of ANSI C63.26 and C63.10

ASC C63 notes that the Wi-Fi Alliance supports adopting the draft ANSI C63.26 standard, developed alongside ANSI C63.10, as a measurement procedure for transmitters operating in the licensed and unlicensed services. However, it notes that ANSI C63.26 does not cover all licensed transmitters, such as LMS, fixed services, satellite systems, TV broadcast, and others.

¹ In the Matter of Amendment of Parts 0,1, 2, 15 and 18 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment and Request for Allowance of Optional Electronic Labeling for Wireless Devices, ET Docket No. 15-170, RM-11673, *Notice of Proposed Rulemaking* (rel. July 21, 2015) (“NPRM”).

With the rapid change in technology, standards need constant vigilance to keep pace. Thus, for now, the test procedures should continue to be used even though they may not address license transmitters noted by the Wi-Fi Alliance.

ASC C63 does not object to the Commission declining to adopt a blanket change to Part 2 test procedures or to remove other test standards such as TIA/EIA 603 or TSB-10. The Commission should follow the recommendation of ASC C63 with respect to whether Section 2.1053 should provide for the direct measurement method, as described in ANSI C63.10- 2013, as an alternative to the use of the substitution test method, as described in TIA-603-D and TIA-102.CAAA-D. Cisco and TIA express a similar concern.

Note: C63.10 is available (as are other FCC referenced C63 standards) for purchase from ANSI or the IEEE.

Referencing KDB Publications

ASC C63 continues to support the integration and referencing of KDB publications which are essential for a public understanding of Commission test procedures and policies. This position is supported by the TIA and, in principle, by the Wi-Fi Alliance and CEA.

Lab Accreditation

ASC C63 reiterates that the elimination of laboratory accreditation requirement as proposed in the NPRM is not desirable as C63 believes that a third party assessment of a test laboratory's competency is the best way to determine that tests are performed with reasonable confidence in

repeatable results. Eliminating such laboratory accreditation requirement would likely bring the results of many test laboratories into question and, in turn, a higher potential for interference to others.

ASC C63 agrees with the comments of Cisco which support accreditation as it affects international compliance testing that purports to be taking into account the measurement methods of the Commission.²

Some commenters who support eliminating the laboratory accreditation requirement state that no longer requiring the use of an accredited testing laboratory will save both money and time, thereby reducing the burdens on manufacturers and facilitating the time to market equipment.³ Furthermore, some of these commenters state that the accreditation requirement was of marginal utility and did not guarantee high-quality test results.

ASC C63 disagrees with these commenters. In particular, the lack of reliable test results by an audited laboratory would cost time and money if an interference complaint occurs in the field and is found to be due to poor test results or incompetent testing. It is ASC C63's experience that accreditation generally improves the quality of the test procedures and results.

References to ANSI Standards

With respect to the Commission's requirements potentially differing from those of ASC C63, ASC C63 notes that the incorporation of ANSI standards will always include a date and/or

² See Cisco Comments at p. 5.

³ See, e.g. Garmin Comments at p. 2 and IBM Comments at p.3.

edition reference. Therefore, any subsequent changes to the standard will not be adopted in the Commission's rules without going through a notice and comment period.

Question on use of CISPR 16 standards

IBM indicated that removing references to CISPR Publication 16 is appropriate given the reliance on ANSI standards, especially when one considers the many revisions to the referenced ANSI standards over the years to make them more complete and in conformity with CISPR Publication 16. ASC C63 agrees with IBM.

Delegating authority to the Office of Engineering and Technology

Both Cisco and TIA support delegated authority for OET. Cisco focuses on using delegated authority to OET to update references to new measurement standards as they evolve, rather than codifying them into rules.

TIA urged the Commission to delegate to OET the ability to maintain detailed KDB guidance on types of equipment that may utilize an SDoC. C63 has no objection to this proposal as it supports C63's view that delegated authority is needed to keep Commission rules in line with consensus industry standards developments.

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We thank the Commission for this opportunity to share our Reply Comments in this proceeding.

Respectfully submitted,

**American National Standards Institute
Accredited Standards Committee C63®**

/s/ Mr. Daniel Hoolihan

Chairman,
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