

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 |
| |) | |

NOTICE OF PROPOSED RULEMAKING

REPLY COMMENTS OF HP Inc.

HP Inc. is pleased to offer reply comments on the above stated matters as described in the Notice of Proposed Rule Making (NPRM) FCC 15-170, released July 21, 2015. NPRM comments submitted October 8th incorporated the Hewlett-Packard Company. These reply comments are of HP Inc.

1. FCC Logo:

The Hewlett-Packard Company originally recommended keeping the Logo and allowing it to be used as an alternative to the text otherwise required on the product under the proposed SDOC program. HP Inc. observes that CISCO, Sony, and Google, made similar comments. The FCC logo is preferable to the use of the otherwise required text statement when the area for labeling on a product is constrained.

2. Accredited Labs/SDoC:

HP Inc. agrees with comments previously filled by ITI, CEA, Garmin, Google, and IBM supporting the FCC's proposal of the SDOC program including the elimination of accreditation as a test lab requirement. HP Inc. believes the FCC's basis for elimination of lab accreditation outlined in paragraphs 25 and 26 of

the NPRM remains valid. HP Inc. believes the elimination of lab accreditation will reduce cost and a barrier to trade without significantly increasing the risk of harmful interference to licensed communications.

Respectfully submitted,

A handwritten signature in blue ink that reads "John Hall". The signature is fluid and cursive, with the first name "John" written in a larger, more prominent script than the last name "Hall".

John Hall
USA and Canada Technical Regulations
HP Inc.
1501 Page Mill Road
Palo Alto, CA. 94304-1101

Dated November 9, 2015