

**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
)	

REPLY COMMENTS OF HEWLETT PACKARD ENTERPRISE COMPANY

Hewlett Packard Enterprise Company (HPE) is pleased to offer comments in response to thoughts filed by other parties on the above stated matter. HPE's interest in this proceeding is that of a global information technology equipment and solutions provider. NPRM comments submitted October 8th incorporated the Hewlett-Packard Company as a whole entity. Reply comments of this writing incorporate only those views of HPE as a result of the company split of November 1st 2015.

1. Declaration of Conformity / Verification rules:

HPE supports combining Declaration of Conformity (2.906) and Verification (2.902) rules along with other commenters such as Google, IBM, Alcatel-Lucent, Boeing, CISCO, Consumer Electronics Association (CEA), Echostar, Sony, and others, into a new Suppliers Declaration of Conformity procedure.

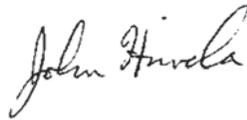
2. Accredited Labs/Suppliers Declaration of Conformity:

HPE agrees with industry peers ITI, Garmin, Google, IBM, and CEA on the Commission's proposal to no longer require accredited test labs for testing products subject to the Commission's self-approval process. Accreditation is of "only marginal utility" for the authorization of unintentional radiators.¹

3. FCC Logo:

HPE agrees with ITI's recommendation, along with that of Google and Sony that the Commission retain the FCC logo (15.19(b)(1)(i)) and allow it to be used as an option in lieu of the statement of 15.19(a)(3).

Respectfully submitted,



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Dated November 9, 2015

¹ 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, FCC 15-92 (rel. Jul. 21, 2015) ("*NPRM*"), ¶ 26.