Notice of Oral Ex Parte Presentation

December 11, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: In the Matter of Amendment of Part 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

Dear Ms. Dortch:

On December 10, 2015 Peter Pitsch and Mario Palacios of Intel Corporation met with Bruce Romano, Jameson Prime, and Rashmi Doshi regarding the above referenced matter. In the course of the conversation, Messrs. Pitsch and Palacios reiterated the positons supported in Intel's filed comments in the proceeding and, in addition, they discussed the following points:

(1) Intel applauds the FCC's efforts to reduce data requirements for imported goods. They noted that importers are unclear about the data collection requirements from June 2016 through December 2016. They recommended that the FCC not require collection or reporting of the information contained in Form 740 either during or after this period. Further, they recommended that the FCC rely on existing U.S.

Customs and Border Protection (CBP) processes. They stressed importers should have the flexibility to manage their own records and develop internal controls for monitoring noncompliant devices.

(2) They stressed again the continuing validity and value of the participatory and innovative KDB process and thanked the FCC for taking several steps to streamline the process for regulatory approvals. They pointed to the proposed change regarding CFR 47, Section 2.925(d) (3) that would streamline the module-labeling process in the case of a change of ID. The change would establish a simple cross reference in the documentation and labeling, eliminating the need for different module stock control units (SKUs) and the labor intensive step of transferring labels.

(3) They also expressed support for the proposed change to the intensive SDR process under CFR 47, Section 2.944. The change would focus on software (SW) security to ensure devices can remain compliant, while still enabling field upgrades.

(4) Finally, they recommended that the FCC continue its efforts to accommodate new technologies, devices, and usage models. For example, the FCC could define conditions and certification methods to allow approved modular radios to be used irrespective of the end host, which would be great benefit for the system integrators, the public, and the IOT industry as a whole.

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R., Section 1.1206, a copy of this letter is being provided to the above mentioned party.

Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

/s/ Peter K. Pitsch

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Executive Director, Communications Policy
Intel Corporation

cc: Bruce Romano
Jameson Prime
Rashmi Doshi
Brian Butler