

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
)	
)	

EX PARTE COMMENTS OF ASC C63

In connection with the Federal Communications Commission’s (“Commission’s”) Notice of Proposed Rulemaking in the above-captioned proceeding,¹ the American National Standards Institute Accredited Standards Committee C63[®] (“ASC C63”) submits these ex parte comments pursuant to 47 C.F.R. §1.1206(b)(2). The purpose of this filing is to advise the Commission of the recent publication of the new standard, ANSI C63.26-2015, “American National Standard of Procedures for Compliance Testing of Transmitters Used in Licensed Radio Services” (“ANSI C63.26”), which the Commission discussed in the NPRM.

Specifically, the Commission acknowledged in Paragraph 111 of the NPRM that ASC C63 was developing a “new standard to address measurement procedures for compliance testing of

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”).

transmitters used in licensed radio services.”² In anticipation of ANSI C63.26 being finalized, the Commission raised a number of questions related to ANSI C63.26 including whether the new standard could potentially replace certain measurement procedures in Part 2 of the Commission’s Rules, as well as individual service rules. Indeed, the Commission asked for comment on “incorporating the ANSI C63.26 into our rules as soon as the standard becomes final.”³

In October 2015, ASC C63 submitted comments in this proceeding advising the Commission that ASC C63 was close to finalizing ANSI C63.26, and supporting the Commission’s efforts to incorporate the standard into the Commission’s Rules. ASC C63 is now pleased to report that ANSI C63.26 is final -- it was approved in December 2015 and published on January 15, 2016. This new standard provides detailed measurement procedures to assist manufacturers and test laboratories to perform consistent and reliable measurements on transmitters which are designed to operate in licensed radio services such as Commercial Mobile Radio Services, Public Mobile Services, Cellular Radiotelephone Services, Personal Communication Services, Miscellaneous Wireless Communications Services, Private Land Mobile Radio Services and Personal Radio Services. The standard provides test methods for measurement of radiated and conducted emissions, RF power, out-of-band emissions, frequency stability and other regulatory requirements for a variety of devices.

ASC C63 urges the Commission to take appropriate steps to incorporate ANSI C63.26 into the Commission’s Rules as soon as possible. Indeed, prompt incorporation of ANSI C63.26 into the

² *Id.* at ¶ 111.

³ *Id.*

Commission's Rules is consistent with the steps already taken by Industry Canada which now accepts the use of ANSI C63.26 for testing licensed transmitters.⁴

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We thank the Commission for this opportunity to share our additional comments in this proceeding.

Respectfully submitted,

American National Standards Institute Accredited
Standards Committee C63[®]

/s/ Mr. Daniel Hoolihan

Chairman,
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February 26, 2016

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⁴ See CB Notice 2016-04 at <http://www.ic.gc.ca/eic/site/mra-arm.nsf/eng/nj00139.html> which advises that Innovation, Science & Economic Development (Canada) has modified RSS-Gen to include adoption of ANSI C63.26.