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In the Matter of)	
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Request for Comments in regards to the)	ET Docket No. 15-170
adoption of C 63.26 in regards to the Ongoing)	DA 16-348
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Amendment of Part 68 regarding Approval of)	
Terminal Equipment by Telecommunications)	
Certification Bodies)	

COMMENTS OF CISCO SYSTEMS, INC.

I. INTRODUCTION

Cisco Systems, Inc. (“Cisco”) submits these comments in response to the Commission’s Public Notice seeking further comments on ANSI C 63.26 for testing transmitters in the licensed services in regards to the proposed modifications to the Commission’s rules for authorizing radiofrequency (“RF”) and terminal equipment.¹

Cisco is the worldwide leader in the design and manufacture of networking and other products used to transport data, video and voice within buildings, across campuses and around the world. As such, Cisco makes extensive use of the Commission’s equipment authorization programs for both intentional radiators (such as Wi-Fi access points) and unintentional radiators (including routers, switches, cable set-top boxes). Most of Cisco’s equipment authorization activity is concentrated toward devices regulated under Part 15 and Part 68 of the Commission’s Rules. As a result, Cisco is very active in related industry standards bodies, including ANSI.

In reviewing the current Commission rules, the use of Part 2 test requirements, like ANSI / TIA 603 standards are more suited for testing narrow band equipment than broadband

¹ *Amendment of Parts 0, 1, 2, and 15 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment; Amendment of Part 68 regarding Approval of Terminal Equipment by Telecommunications Certification Bodies*, ET Docket No. 13-44, *Notice of Proposed Rulemaking*, 28 FCC Rcd 1606 (2013), *summarized*, 78 Fed. Reg. 25916 (May 3, 2013).

equipment.² Both the Part 2 test procedures and the ANSI / TIA 603 standards are more focused on analog type systems than digital systems.³ As such C63.26 was developed for testing Broadband Digital systems, though it does contain a generic procedure to perform narrow band testing as well

Cisco was very actively involved with the development of C 63.26 and its sister standard C 63.10 for testing licensed exempt equipment. The standard was developed in cooperation with the FCC Authorization Branch and Canada's ISED.

As an initial matter, Cisco reminds the Commission that C 63.10 was addressed by the Commission in an earlier Rulemaking and is now used by the industry to test and evaluate licensed exempt radio equipment in accordance with published FCC KDB⁴.

The argument to adopt C63.26 is straightforward. First, the C63.26 standard is based, in part, on C 63.10. While C63.26 is focused on licensed systems, the test methodologies are similar. Familiarity helps ensure tests are conducted correctly. Second, the first version of C 63.26 is focused on testing mobile digital systems used in various CMRS and Broadband applications, which are today widely deployed. Third, a majority of the systems offered in the market today include licensed exempt radios which are tested in accordance with the C 63.10 standard. Fourth, given that most of the referenced FCC licensed radio test procedures (other than certain FCC KDBs) are focused on analog systems, the need for C 63.26's focus on digital systems is quite

² Recent update to ANSI / TIA focused on Public Safety systems which for the most part use narrow band technology.

³ Please note that the ANSI / TIA standard is of broader applicability than the ANSI C 63.26 standard, and so the two standards are not substitutes for one another.

⁴ Reference FCC KDB 94 614 which references both C63.10 as well as ANSI / TIA 603 for sue of testing wireless devices.

apparent. Finally, though some updates to ANSI /TIA 603 have occurred they have been focused on Public Safety and not Digital Broadband mobile systems.

As Cisco referenced in its comments filed as part of the overall rulemaking, the removal of test procedures in regards to Part 2 is premature as the current C 63.26 does not address all technologies. The current version is geared to the mobile and broadband radios used in Part 22, 24, 25, 27, 90, and 95. TV broadcast systems under Part 74, high power analog land mobile services under Part 90 and other similar technologies are not addressed in the first version of the standard. Though ANSI / TIA 603 can be used for these, it is not really been developed to be used for digital CMRS and broadband today because the standard is more focused to narrow band analog systems. Without the adoption of the C63.26 standard, industry would limit any test procedures to that provided by FCC KDB's to accurately test and digital based broadband systems. For example, in order to test broadband boosters, the FCC lab has developed a KDB guidance note on a test procedure for this. This KDB was developed based on the work done by the C 63.26 committee addressing Boosters. As such the standard itself has a bit more detail in regards to testing Boosters as work continued after the FCC lab released the KDB.

In addition, the Commission should note that the C 63.26 standard has been adopted by the Canadian Innovation, Scientific and Economic Development Agency Former Industry Canada) as part of their RSS-Gen Rev which addresses radio test procedures. Thus, if the Commission adopts C 63.26, industry will have a streamlined North American test process by allowing the use of the same test standard and test set ups.

In regards to test procedures, in the specific Commission rule parts covered by the current version of C 63.26, most of the rules have been addressed in the technical standards. However, because C63.26 does not apply to all systems, we recommend that at this time the existing test

procedures stay in the regulations to cover any corner cases the first version may have not fully addressed.

The Commission should also be aware that there is currently is an active project in the C 63.26 work committee to start on version 2 to address additional scope and address open issues not covered by the current version.

Cisco Systems strongly recommends the Commission adopt C 63.26 Revision 1 by reference under 47 CFR 2.910 of the rules to allow the industry to accurately test the various broadband mobile devices used in the licensed services.

Respectfully submitted,

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