

Cohen, Dippell and Everist, P.C.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Comments Sought on Newly Published) MB Docket No. 15-170
ANSI C63.26-2015 Standard in)
Conjunction with Ongoing Equipment)
Authorization Rulemaking Proceeding)

Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. (“CDE”) and is in response to the Public Notice dated April 1, 2016. CDE and its predecessors have practiced before the Federal Communications Commission (“FCC”) for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communication industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

As the FCC in the Notice of Proposed Rulemaking of ET Docket No. 15-170 (Released July 21, 2015) stated, the telecommunications industry supplies a number of devices both for industrial, commercial and home use. The FCC is to be commended on its efforts to update and

make relevant its equipment authorizations procedures. It is only through the FCC's on-going efforts will this society fully benefit from the innovation that is occurring and will occur in the future. As the FCC indicated, it is the equipment authorization procedure that is the front line in its efforts that devices can be subject to scrutiny so that harmful interference and electronic noise across the RF spectrum is not generated by the device.

The FCC in the April 1, 2016 Public Notice entitled, "Comments Sought on Newly Published ANSI C63.26-2015 Standard in Conjunction With Ongoing Equipment Authorization Rulemaking Proceeding" indicates "that references to the applicable measurement procedures in ANSI C63.26 could replace measurement procedures set forth in both Part 2 equipment authorization rules and many of the specific licensed services rule parts."³

Without addressing the validity of the ANSI C63.26 that it will be a reliable and consistent measurement methodology for the current and future FCC endeavors, it is not clear how the FCC will replace its proposed/present rules with ANSI C63.26. Will the FCC provide specific details via reference? Further current FCC Rules are publicly available on-line. Also currently, the FCC makes publicly available the Knowledge Database ("KDB").

³EA NPRM, 30 FCC Rcd at 7764, Para. 111. ANSI C63.26 is particularly relevant to the testing of digital devices, since our existing rules mostly address older analog technologies and our supplemental guidance for digital measurements has generally been provided on an ad hoc basis. Moreover, because the standard complements the ANSI C63.10 standard for measurement procedures for unlicensed devices (which the Commission recently incorporated by reference), the use of ANSI C63.26 would facilitate the testing of devices that contain both licensed and unlicensed transmitters.

As noted in the Federal Register dated April 20, 2016, Vol. 81, No. 76, Page 23268, ANSI C63.26 is only currently available for a fee. Therefore, it appears the FCC will now require anyone including the general public who wishes to make reference to the FCC Rules in this area will not have immediate access to the pertinent rules but will be required to take an additional step which requires a fee.

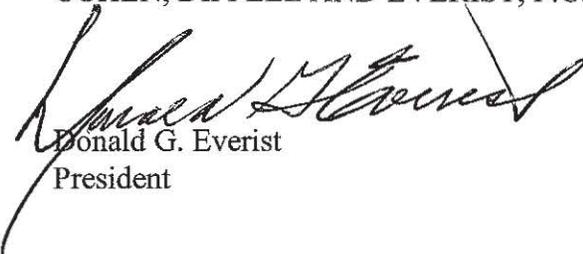
To this firm's knowledge, notwithstanding the merits of ANSI C63.26, has the FCC taken this step to reference a document which is not in the public domain.

Therefore, the FCC is urged to consider the availability of its technical rules in view of references to ANSI C63.26.

This firm expresses its continued appreciation of the FCC's efforts to promote and assist in the monitoring of industrial, commercial and consumer devices to be in compliance with its very necessary and important Rules and Regulations.

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.



Donald G. Everist
President

DATE: May 5, 2016