1 are you prepared to move towards DOCs which do have a role
2 for TCBs.
3 MR. HURST: Yes, thank you. This is Bill Hurst.
4 I think you've characterized, I think, the four
5 realities very well, and as I look at my statement of
6 "staying the course," I believe in the decision of December
7 17, 1998, where TCBs were created, that that -- that that is
8 the clearly defined that the FCC has established at this
9 moment in time, and I would, as we get all of these
10 discussions of saying let's quickly go to these other
11 routes, we are changing that process.
12 I would like -- I would like to move to where we
13 have TCBs. We create those certification bodies, and as
14 we've discussed, there is various issues as to why it would
15 be valuable to have a TCB. If we allow those bodies to
16 become operational, they become established, they will be
17 there as an option for us as we move forward and continue to
18 streamline.
19 If we move immediately at this moment in time to a
20 verification, those bodies will not -- will never be
21 organized because there is no incentive to do so.
22 I believe that by giving it the sufficient amount
23 of time, those organization have an incentive. They will
24 get established, and then it is there as a tool to use as
25 needed.

1 I am in support of moving to the supplier
2 declaration of conformity. I believe that accreditation is
3 the valid tool to show that a laboratory, whether it's a
4 manufacturer laboratory or an independent laboratory, is
5 competent to do this its job, and I believe the
6 accreditation is a valuable tool that takes them throughout
7 the world with showing their competence.
8 And so I believe in staying the course there is a
9 very logical progression that we can go through. One, we
10 can allow the TCBs to become established so that that can be
11 a tool for us to use in the future, and also to move to the
12 declaration of conformity so that manufacturers can make
13 that declaration on products that the FCC that it's now
14 appropriate to do.
15 MR. VARMA: So in the process would you go to the
16 transition that I discussed earlier with Mr. O'Neill?
17 Namely, that the TCBs initially would begin to certify CPE
18 and then down the road we might make a transition to DOCs,
19 or would you be prepared to go ahead and institute the DOC
20 mechanism right up front?
21 MR. HURST: No, my preference would be to -- to do
22 a step transition where immediately we have -- on the books
23 today we have a process for TCBs. We allow that to begin to
24 operate, and then we pick some date in the future where the
25 declaration of conformity can then be used because that

1 period of time would allow these certification bodies to
2 become established whereas if we went to the DOC at this
3 moment in time, there is tremendous burdens placed on these
4 independent laboratories that they must meet in order to
5 become qualified. There is tremendous cost and time that is
6 required to do so, and if we say that you don't even need to
7 become qualified, there is absolutely no incentive to have
8 those bodies become established in the U.S.
9 And so we will have lost that opportunity to
10 create this private sector group out there that we can turn
11 to on those particular products or issues that the carriers
12 feel that there is a valid need for them, and so we've lost
13 an opportunity to create this group that can serve us in the
14 future.
15 MR. VARMA: Okay, thanks, Bill.
16 John, those are all the questions that I have.
17 MR. BERRESFORD: Okay. We'll take a few more
18 comments and then we'll take a break.
19 Mr. Adornato, I think you had your hand up first.
20 MR. ADORNATO: Yes, this is Pierre Adornato. I
21 would just like to respond briefly to Mr. Hurst's comment.
22 And the sense of the point I'd like to make is
23 that, for example, by going directly to the DOC or
24 verification option for Part 68 equipment, we're not doing
25 away with the TCB concept, just to push it down one further

1 step of regularity. The Docket Order 98-68 that was alluded
2 to for the formation of TCBs dealt with both radio equipment
3 and thermal attachment equipment. This particular hearing
4 and this forum deals only with Part 68 equipment.
5 There is no contradiction in my mind to allow the
6 progress of the TCBs for radio equipment and yet to allow us
7 different courses for the Part 68 equipment.
8 MR. BERRESFORD: Thank you.
9 Mr. Shinn.
10 MR. SHINN: Thank you. John Shinn, Nortel
11 Networks.
12 As far as the step process, I am in the position
13 that today I could go to a supplier declaration of
14 conformity, and it would be -- that would be the simplest
15 way. I could do it today. I don't have -- I'm there, and I
16 don't feel that I would want to go to this process.
17 As Pierre had indicated, it's for radio, that
18 obviously the radio and that equipment is going to be
19 through the TCB, but for me as a manufacturer with my own
20 labs, all the accreditations in place, I don't need a TCB
21 and I wouldn't want to have to go through that process.
22 MR. BERRESFORD: Thank you.
23 Any one else at the moment? Oh, Mr. Bipes.
24 MR. BIPES: John Bipes, Mobil Engineering.
25 I was really intrigued by Stan Roberts' comment

1 about verification and the Latin origin veritas being truth,
2 and I think we probably have an awful lot of agreement
3 within this room that we want the truth. I think going
4 after the truth probably is best done on a consensual basis
5 and by having a rather healthy suspicion of our own motives.
6 Sometimes those motives take the form of profit, sometimes
7 speed, sometimes a combination of them.
8 But as we are seeking the truth about our own
9 product and its integrity, for example, with respect to
10 compatibility with the network, I think terms like
11 "accreditation" and "third party evaluation" can be
12 enormously helpful toward finally arriving at the truth.
13 MR. BERRESFORD: Thank you.
14 Let's take a 15-minute break and reconvene at
15 10:45.
16 MR. HOWDEN: John.
17 MR. BERRESFORD: Yes.
18 MR. HOWDEN: Before we break, can you just
19 clarification, are we going to meet this afternoon or not,
20 or do we know?
21 MR. BERRESFORD: I don't know. I hadn't -- I was
22 going to wait and see where things looked at about a quarter
23 of noon.
24 Does anyone foresee a topic that would keep us in
25 session after lunch today?

1 MR. VARMA: Well, John, as you may recall, I had
2 requested that we reserve the afternoon of the second day to
3 try to wrap up unfinished business, if any. We were not
4 absolutely certain as to how much time each of the three
5 fora would take, and there was a possibility that there
6 might have been some spillover business. That's the reason
7 we had reserved the afternoon of the second day.
8 It appears to me, with the two fora behind us
9 yesterday and the third one now in full progress that we
10 have made an enormous amount of progress. We have had a
11 good discussion.
12 From my own vantage point, it appears to me that
13 there is not likely to be any unfinished business that will
14 require us to reconvene this afternoon. So for those of you
15 who have to finalize your travel plans, my best estimate at
16 this point is that we ought to be able to wrap it up before
17 noon.
18 MR. BERRESFORD: Would anybody else like to
19 comment on that?
20 Very well, we will see you all at 10:45.
21 (Whereupon, a recess was taken.)
22 MR. BERRESFORD: Very well, let us reconvene. I
23 guess I will ask, Mr. Schroeder, do you have any questions?
24 MR. SCHROEDER: Yes, just a couple.
25 When we left off, we were talking, well, about a

1 number of things, one of which was who should interpret the
2 rules. I gather under the TCB process, the TCB would be at
3 least the first stop in seeking a rule interpretation.
4 I guess, the first part of my question is with
5 declaration of conformity or verification, if that were the
6 process, what provision would there be for interpreting
7 rules? How would a manufacturer in making that declaration
8 know that what it thought the rule meant was actually the
9 accepted meaning? And if there were a novel issue that were
10 to come up because, for example, the technology had
11 developed and the existing rules didn't squarely address
12 that technology, how would the manufacturer know how to
13 apply the rules?
14 Anyone? Mr. Wagner.
15 MR. WAGNER: John Wagner with Lucent Technologies.
16 I do not think the manufacturer should be allowed
17 to make rule interpretations other than very, very
18 insignificant things that may -- the product may be covered
19 under the rules but there is a slight variation of how do we
20 apply this. But in terms of anything that is not clearly
21 covered under the rules, that really needs to be delegated
22 to someone other than either an outside test laboratory,
23 independent, or to a manufacturer's lab. There needs to be
24 a higher level authority established if it's not handled by
25 the Common Carrier Bureau.

1 MR. SCHROEDER: Mr. Hurst.

2 MR. HURST: Yes. Bill Hurst.

3 Just a comment on Docket 98-68, and, again, it's
4 the terminology issue, but it clearly states that the TCB is
5 not allowed to make interpretations of the rules.

6 We have numerous discussions, as I've chaired an
7 industry working group, addressing how the TCBs are going to
8 operate. And really, as was just mentioned, all of these
9 groups are going to be applying the rules. They've got to
10 have enough knowledge to know how to apply the rules
11 properly, and if there is any question on interpretation, it
12 needs to go back to the FCC for that decision, whereas a TCB
13 at least is an avenue to review and make sure that the rules
14 have been applied properly, and so that needs to go back
15 finally to the FCC under the current systems.

16 MR. SCHROEDER: Mr. Shinn.

17 MR. SHINN: Thank you. John Shinn, Nortel.

18 On the interpretations, I think, would be a better
19 way of putting it as to the rules, looking at, you know, the
20 TCB versus suppler declaration of conformity, and even
21 though I as a manufacturer I'm not allowed to be a TCB
22 because I'm associated with a manufacturer.

23 The question is what does a TCB know that I don't
24 know in the ability to interpret or understand what the
25 rules mean, and I agree that we should go back to the FCC as

1 for an actual official ruling.

2 And I would also like to address the -- if you

3 don't mind, a little side track here -- address the issue of

4 the waivers and the waiver process, and again, how is that

5 going to be handled.

6 I have presently two waiver requests into the FCC

7 presently, it's been in since October of last year. I have

8 had no response on these. You know, why is this taking so

9 long in this process? And could this process be speeded up

10 in any way? So that's my question to the FCC.

11 MR. SCHROEDER: Yeah. Yeah, the process, I think,

12 could be -- could be sped up. It's a matter of, I guess,

13 priorities competing for our limited resources and that's

14 what drives the timing on a lot of things that we need to

15 have done, and I think that points up, you know, one of the

16 needs for some reform of Part 68, that the waiver process

17 doesn't always work as well as it could in an ideal world.

18 We don't live in an ideal world, and I guess we're looking

19 for something to replace it that would -- that would

20 guarantee some resolution maybe more quickly than they way

21 the process can give us.

22 Well, I guess that -- that's as much as I can say

23 on it.

24 MR. SHINN: Like I say, I have the two waivers in

25 now, and we're ready, what them to be processed, and this

1 time delay is very expensive, and a lot of -- you know, the
2 market window is moving.
3 MR. SCHROEDER: Yes.
4 MR. SHINN: And how can I speed up that process?
5 MR. SCHROEDER: Mr. Adornato.
6 MR. ADORNATO: Pierre Adornato speaking for TIA.
7 Just to answer your question and the
8 interpretation of rules, I'd like to address both the
9 present way of doing it and how things might work in the
10 future with the scenarios that we've envisioned.
11 Presently, we have a group that has been active
12 for many years, TIA TR-41.9, which we discussed a number of
13 times, chaired by Anh Wride, and that when it comes to rule
14 interpretations and relatively minor matter.
15 Traditionally, the question is brought to that
16 group is discussed and interpretation is made on relatively
17 minor issues. On major issues, such as the one that John
18 Shinn mentioned, then we get into the waiver process, and
19 that is an existing process and we have, of course, talked
20 about the possible delays in that. That is the way that
21 things work right now.
22 In the future, given the scenarios that were
23 discussed in forum two yesterday where we expect that the
24 technical requirements might -- that might be delegated to
25 standards organization, then that will be the forum where

1 the need to discuss interpretations will be done, and that
2 would happen in due time. That's my comment.
3 MR. SCHROEDER: Thank you.
4 From the audience?
5 MR. CARLO: Thank you. My name is Jim Carlo
6 again, from Texas Instrument.
7 One of the things we talked about yesterday is
8 standards, and one of the things that you may not be aware
9 of is there is several groups working on inter-operability
10 testing that TI is a part of, as well as most of the
11 companies here are.
12 So when a standard is developed there is a whole
13 body of groups that are doing intra-ability testing to make
14 sure that different equipment from different vendors works
15 together with other equipment with other vendors. And, in
16 fact, there is also different bodies that are actually doing
17 testing to the standard.
18 So I think a little bit of a follow up to what
19 Pierre was saying is that, as part of the standards process,
20 there is also a lot of intra-ability testing, so as the FCC
21 moves more toward pointing to standards, then the standards
22 body is somewhat from the industry as a self-policing
23 organization because it's our job to make sure that products
24 from one company will intra-operate with another company.
25 Thank you.

1 MR. SCHROEDER: Thank you.

2 Anyone else?

3 As, I guess, a follow-up question -- well, this
4 question actually would apply in two different areas. If a
5 rule interpretation is one that perhaps doesn't favor the
6 manufacturer's equipment that's being tested, or if, on the
7 other hand, a carrier feels that a rule should be
8 interpreted, I guess, in a way that doesn't allow inter-
9 connection of a particular piece of equipment, what avenue
10 would either the carrier or the manufacturer or anyone else
11 who would have an interest in the matter for that piece of
12 equipment and for that rule interpretation, where would they
13 go to have that settled, to appeal?

14 Would you foresee an FCC appeal process once the
15 person who is questioning the rule interpretation had gone
16 to the standards development organization that we would
17 delegate the initial interpretation duties to?

18 Any -- Jim.

19 MR. SALINAS: Jimmy Salinas, SBC.

20 As it was brought up yesterday at several
21 occasions, that everybody feels that the final decision on
22 any problems associated with equipment standards or whatever
23 should be sitting within the FCC. They are the final body.
24 They are the -- how would you say -- the rule of law to
25 speak, and that definitely has to sit in that particular

1 department. If it sits anywhere else, there is always an
2 open possibility of somebody protesting the decision.
3 MR. SCHROEDER: Pierre.
4 MR. ADORNATO: Once again, Pierre Adornato
5 speaking for TIA.
6 I surely agree with that, and that would be the
7 ultimate. However, I would like to point out that any ANSI-
8 accredited standards organization does have a built-in
9 appeal process, i.e., even after the democratic voting
10 process, anybody who is not happy with the outcome can --
11 has the right and it has been done several times appeal
12 within the actual committee for some further interpretation
13 of the final resolution, and I think that's the FCC should
14 be called in only after that appeal process has been
15 exhausted.
16 MR. SCHROEDER: The other way I wanted to ask that
17 question is if you -- moving outside the rule interpretation
18 scenario or context -- if you have a -- if we were to adopt,
19 I guess, a certification approach where TCBs would certify
20 equipment, similar to what we do in registering equipment
21 currently, would you see the FCC as the first stop in an
22 appeal if the TCB didn't register the equipment because it
23 didn't comply with the rules and there wasn't really any
24 disagreement over what the rules meant?
25 What would you see us doing there? Anyone? Mr.

1 Hurst.

2 MR. HURST: This is Bill Hurst again, with CCL.

3 One of the interesting concerns and facets of the

4 TCB program is a competitive process now and perhaps the

5 danger is that different TCBs could give out different

6 decisions. And so the concern is that the TCBs will

7 communicate amongst themselves, as proposed, that that

8 discussion take place, and I would think that through the

9 SDO they would become an important involvement, and that

10 discussion is there so that all parties, manufacturers, the

11 TCBs, and the FCC are all part of the discussion and there

12 is a common understanding to avoid that problem.

13 But there is that mechanism to have a discussion

14 to make sure that everyone agrees with the decisions that

15 are being made.

16 If a party disagrees with that, then they need to

17 have the opportunity to take that to the FCC, whose role is

18 the final decision.

19 MR. SCHROEDER: Thank you.

20 Mr. Salinas.

21 MR. SALINAS: Jimmy Salinas, SBC.

22 I do agree 100 percent that at that point where

23 the level you are associated with the TCBs doing the work

24 and the standards body doing the work, the very next step is

25 the FCC.

1 MR. SCHROEDER: Okay. Should a carrier be
2 permitted to take an appeal of an approved certification?
3 Anyone? Trone.
4 MR. BISHOP: Yes, we do feel strongly about that.
5 In fact, I believe that was mentioned in the Ameritech
6 comments that were -- that were filed. But there is
7 currently a -- there is currently a process in Part 68 where
8 the telephone company can make an appeal to the FCC. I
9 believe it's in subpart B. I can't quote you the section,
10 but we do feel that should remain in place if there were any
11 streamlining.
12 MR. SCHROEDER: Thank you.
13 Mr. Salinas.
14 MR. SALINAS: Yes, sir. As mentioned in Part 68,
15 the whole purpose of Part 68 is to protect the employees,
16 protect the network, protect the building. In every
17 scenario, you're talking carrier. If Part 68 was placed
18 there for that purpose, then the carrier must maintain the
19 ability to register complaints.
20 MR. SCHROEDER: Thank you.
21 One other question and then I'll be through. If
22 we have, I guess, a TCB process, as I understand it the TCBs
23 will be keeping a listing of whose equipment they have
24 approved; is that correct? Okay.
25 If we went to verification or self-declaration,

1 however, how would we know that the equipment had been
2 certified -- verified or declared? Would there be a
3 database held by the SDO, for example, or kept up by the
4 SDO?
5 Mr. Hurst.
6 MR. HURST: Yes, Bill Hurst.
7 Under the current proposals where we just adopt
8 the definitions under Part 2 for either declaration of
9 conformity or verification, they do not call for any
10 database to be kept. And so if those schemes are adopted,
11 there would be not be a database.
12 And so I believe the database is a valuable tool
13 from enforcement; provides some assurance to the carriers.
14 As was mentioned yesterday, they want to be able to, one, go
15 down and find out who is responsible, and so there would
16 have to be some addition to say someone is going to be the
17 keeper of a database, and now how do you do that processing.
18 MR. SCHROEDER: Yeah, well, that's -- that's part
19 of the question, I guess. Yeah, I guess it certainly could
20 be possible that we might say that simply by the fact that
21 you're marketing or importing the equipment, that you have
22 verified or declared that it's in compliance with whatever
23 the technical standards are. But, yeah, I would think that
24 might create some challenges when it comes to enforcement
25 for the FCC.

1 Mr. Shinn?

2 MR. SHINN: John Shinn, Nortel Networks.

3 In the declaration of conformity specifically, and
4 normally as in Part 15, there is basically -- it's a
5 certificate, if you will, which is included in the manual,
6 not only who tested it, what the -- the manufacturer's
7 information is there, but also phone numbers of contacts
8 that -- who to call, particularly enforcement activities and
9 this type of thing, and then factors. That's exactly why the
10 number is there, so you -- the FCC, at least the Office of
11 Engineering & Technology enforcement people could contact,
12 who to contact for enforcement activities such as that.

13 So that would be there in the manual, although it
14 wouldn't be on the phone or on the equipment itself. So
15 that is available there.

16 The verification process may not in fact actually
17 have that other than maybe if you boilerplate it complies,
18 and that's the end of it. So I see the declaration of
19 conformity having that information for you.

20 Now, somebody is going to have read the manual, so
21 I see it there, and that's where that would be.

22 The other thing, if as a decision by the FCC,
23 whether you want a national database, for example, you could
24 require that any time you do a verification or declaration
25 of conformity or the TCB, in fact, just listing to -- just

1 simply fill out a little form and send it to you and you --
2 the manufacturer model, number of contacts, et cetera, and
3 that would be, you know, your choice.
4 MR. SCHROEDER: Ma'am?
5 MS. WRIDE: I believe that a workable tool would
6 be not a centralized database where the FCC may have to
7 devote resources to, but perhaps even a distributed one
8 where the manufacturer's web site may have all the
9 information and for enforcement purposes you should be able
10 to go there and access the information, or the TCB can also
11 keep the database as well. This is a workable tool, I
12 believe.
13 MR. SCHROEDER: Thank you.
14 Anyone else? All right, Trone.
15 MR. BISHOP: Yeah, I hate to disagree with Anh,
16 but the -- you know, things on the internet, files on the
17 internet have a way of disappearing, and particularly
18 terminal equipment may be attached to the network for 20
19 years or more. Certain suppliers and manufacturers, they
20 may no longer be in existence.
21 But the USTA mention in their comments that they
22 thought that there should be a centralized database. We
23 certainly support that. If it's problematic for the FCC to
24 administer a database, that can be out-sourced too. I mean,
25 you know, there are some solutions here.

1 MR. SCHROEDER: Yes. Thank you.
2 MR. BISHOP: So that's my comments.
3 MR. SCHROEDER: Anyone else?
4 Those are all my questions, John.
5 MR. BERRESFORD: Thank you.
6 Mr. Howden, do you have any questions?
7 MR. HOWDEN: No.
8 MR. BERRESFORD: Ms. Magnotti?
9 MS. MAGNOTTI: Yes, I do.
10 MR. BERRESFORD: Please.
11 MS. MAGNOTTI: Thanks. Susan Magnotti, with the
12 Network Services Division, Common Carrier Bureau.
13 This morning we were listening to different
14 opinions from different members of industry for whether we
15 should use the TCBs or declaration of conformity or
16 verification. And I'm wondering if there is another option,
17 and that is, if we had standards for all three alternatives
18 in our rules.
19 In other words, based on certain criteria, which
20 I'd like to hear some comments on, you would either be able
21 to go to a TCB or do DOC or verification, what kind of
22 choice would -- how would that choice be made? Would it be
23 made by the track record of the manufacturer and their
24 experience and maybe their in-house capability? Or would it
25 be made by product type or some combination?

1 Are there any ideas on that? Yes?

2 MR. HURST: This is Bill Hurst from CCL.

3 Actually, I alluded to, I think, this as one of
4 the possibilities that we could end up with. As we look at
5 going down the road, there may be a justifiable reason to
6 have a choice as to which of the methods that was used.

7 If we look in FCC Part 15, subpart (b), there is a
8 table that defines it by equipment type as to which -- which
9 method is going to be used. And, for example, for personal
10 computers you're given a choice of either certification or
11 declaration of conformity.

12 And I think that there is a value in looking at
13 some options and some choices, and I think that's probably
14 the best world as we move forward to say that certain
15 products have a greater risk than other products, and as a
16 result, they may be at a different, different conformity
17 assessment module that would be used.

18 So to do it by a manufacturer and their experience
19 would be extremely difficult. There, I think, you're coming
20 back and saying, "How do you judge them?" Accreditation
21 would be a way to judge whether or not their laboratory is
22 capable or not, and that's where you can go the declaration
23 of conformity to say that, okay, we're willing to just allow
24 the manufacturer to make that declaration, and the assurancy
25 you're getting is accreditation, whereas if you have a

1 choice to say that certain products, there is a greater
2 risk, and so as a result we wish to have the certification
3 as the route.
4 I would hope that in any case that we end up with
5 certification always is an option so that manufacturers have
6 the ability to get that certificate that they can use in
7 this country and other countries to show that they comply.
8 MS. MAGNOTTI: Any other comments?
9 Mr. Salinas?
10 MR. SALINAS: Yes, ma'am. I'm Jimmy Salinas, SBC.
11 I agree with Bill on the scenario associated with
12 certification. If the manufacturer has a certified lab,
13 then he has the ability to validate that his equipment does
14 meet compliance. If the manufacturer is not large enough to
15 maintain a certified lab, then let me go to an outside lab
16 and have that outside certified lab do that same scenario,
17 or let me go to a TCB to let me go to that scenario. As
18 long as I have a base of a certified lab, I can do
19 verification, DOC or TCB, any combination of, depending on
20 where that certified lab is, whether I maintain it or
21 whether I go to somebody else's lab.
22 MS. MAGNOTTI: Anyone else?
23 Would that have any effect on the international
24 trade concept that you mentioned earlier, Mr. Wagner, or
25 would that help or hurt it?

1 MR. WAGNER: John Wagner, Lucent Technologies.

2 I don't believe so. I think if we look back again
3 to Part 16, different categories of equipment under Part 15
4 are permitted under the verification process, and personal
5 computers, for example, are the ones who are specifically
6 called out that are required to use the declaration of
7 conformity process, or the certification process.

8 And I think the rationale there is that the
9 potential for harm, certainly, you know, for example, there
10 are probably many, many, many manufacturers who produce hand
11 sets, terminals. There are very few manufacturers who
12 perhaps product terminal equipment that is more like PBXs
13 and what have you, and they are probably larger and more
14 capable of evaluating their own products, and in fact,
15 probably they are the best people to evaluate their own
16 products as opposed to any outside laboratory.

17 And I think the confidence that the FCC might see
18 in that might lead you to say, well, okay, for certain
19 categories of Part 68 equipment you might allow the
20 verification process if you did not want to do that for the
21 entire gamut of products, and I don't think it will have any
22 impact on the international arena. It kind of looks like
23 Part 15.

24 MS. MAGNOTTI: Okay. Ms. Wride.

25 MS. WRIDE: I just wanted to amplify on the

1 concept of certification. A lot of small manufacturers have
2 approach me to ask if -- what they would do if suddenly
3 there is no certification for Part 68; you know, they don't
4 have this little piece of paper when they go to a small
5 country outside of the U.S. where they would want to have
6 something maybe from the government, backed by the
7 government.
8 And I think there the concept of TCB certification
9 as an option is valuable because the TCB is actually
10 authorized basically by the government to operate, so the
11 approval paper, the approval grant from the TCB would allow
12 these manufacturers to use, you know, in international
13 trade.
14 MS. MAGNOTTI: Yes, Mr. Godfrey.
15 MR. GODFREY: I think ITI members would say that
16 as long as there is an option among the three methods we've
17 talked about, that's probably the best of all possible
18 worlds for trade. No other country would interpret the U.S.
19 system as being restrictive there. If other countries
20 adopted a similar model to that, then it would -- it would
21 prevent barriers from being erected in other countries, and
22 you would still have the option for small and medium-sized
23 manufacturers.
24 MS. MAGNOTTI: Okay, thank you.
25 Mr. Shinn.

1 MR. SHINN: John Shinn, Nortel Networks.

2 A comment on the international trade. I know that
3 many times I've been asked by, particularly South American
4 countries, for example, to provide a copy of my certificate
5 from the registration from Part 68. That would be
6 appropriate because I already -- that's the only option I
7 presently have and the only piece of paper that says it is
8 Part 68 registered.

9 I don't see where there would be a significant
10 impact if under the declaration of conformity, for example,
11 I could provide a supplier's declaration of conformity, a
12 certificate, although I generate it, that basically says it
13 does comply, and I feel that most countries as a SDOC would
14 accept that certificate in lieu of some third party
15 certificate.

16 MS. MAGNOTTI: Does anyone have any ideas for
17 where we should break out the equipment types that they are
18 willing to talk about now, between TCBs or DOC verification?

19 MR. GODFREY: We could make all the options
20 available for all the equipment types. That's been to a
21 lesser extent what John Wagner just referred to as for
22 personal computers. In Part 15, you currently have a choice
23 between certification or DOC. There is no mandate as to
24 which of those you use.

25 MS. MAGNOTTI: That's true, but we've heard today,

1 we've heard some specific problems with going with -- you
2 know, with no certification or with only the verification
3 process.
4 If there is an option with no basis for choosing
5 among them, would that -- would that cause a problem or
6 would just the fact that they are there be sufficient?
7 Mr. Hurst.
8 MR. HURST: Bill Hurst. I'll comment.
9 I mean, I have actually thought of this process,
10 thinking that this might be the solution that we need to
11 eventually come to, and obviously, I think we need to sit
12 down with all the carriers because it's their networks that
13 are going to have potential harm, as well as the
14 manufacturers.
15 But I think there is some logic to say that, you
16 know, we're the greater risk, and I have to agree that the
17 PBX manufacturers, the switch manufacturers tend to be very
18 large manufacturers and generally have a great deal of
19 competence and ability in what they can do, and so that may
20 be something that gets on the lower scale of things.
21 I noted in particular that we excluded some of the
22 disability issues here in compatibility, and I question to
23 say if in fact we're changing the processes for them, we in
24 fact are touching on disability issues, and so as a result,
25 I read into that that we should be putting that at the high