Before the Federal Communications Commission
Washington, D.C. 20554

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| Amendment of Parts 0, 1, 2, and 15 of the | ) | |
| Commission's Rules regarding | ) | |
| Authorization | ) | |
| of Radiofrequency Equipment | ) | |
| | ) | ET Docket No. 13-44 RM-11652 |
| Amendment of Part 68 regarding | ) | |
| Approval of Terminal Equipment by | ) | |
| Telecommunications | ) | |
| Certification Bodies | ) | |

NOTICE OF PROPOSED RULEMAKING

Teradata Corporation submits the following comments on FCC 13-19, ET Docket No. 13-44

Clause 49-52:
We support requiring test laboratories that test equipment subject to certification and DoC be accredited to ISO/IEC 17025 and that laboratories compile a description of their measurement facilities. This does not seem to be a burdensome requirement. However, the proposal to consider prohibiting an accredited laboratory to subcontract tests seems overly restrictive. Subcontracting of testing by an accredited laboratory is already covered by requirements in ISO/IEC 17025. If an accredited laboratory has subcontracting processes in place that meet the requirements of ISO/IEC 17025, there should be no reason why such subcontracted testing should not be allowed. Subcontracted testing in accordance with the requirements of ISO/IEC 17025 can be necessary at times (for example, test equipment outages, temporary lack of availability of personnel or test facilities, etc.) A ban on subcontracted tests that legitimately comply with the quality requirements of ISO/IEC 17025 is overly restrictive and can place a financial hardship on accredited test laboratories. All testing that Teradata has subcontracted has been to other ISO/IEC 17095 accredited laboratories and in accordance with the requirements of Teradata's lab accreditation. We ask that the FCC not place this restriction on subcontracting tests on accredited labs.

Clause 59:
The proposal to require test site validation above 1 GHz be conducted according to the $V_{SWR}$ method in CISPR 16-1-4 represents a severe burden on some test laboratories. Very many test laboratories are currently conducting site validation $V_{SWR}$ measurements from 1-6 GHz and performing final measurements at a fixed antenna height. Altering some facilities, such as Open Area Test Sites (OATS) with weather domes, to perform site validation $V_{SWR}$ measurements to much higher frequencies and final measurements that scan 1-4 meters in antenna height can represent a substantial modification to

existing test facilities and can be a substantial cost burden to the laboratory. Based on our experience in validating our site for CISPR 22 1-6 G Hz measurements at a fixed antenna height, we estimate extensive modifications to our OATS will be required to meet the site validation requirements in the NPRM and final measurements made from an antenna height that varies 1-4m. We request that the proposal to use the $V_{SWR}$ method for site validation be delayed for at least 2 years and the use of the alternative absorber on the ground plane be allowed in the interim. This will allow laboratories to prepare in an orderly manner for the substantial burden of facility modifications involved.

Clauses 59 and 67:

We object to the proposals adopting the view in ANSI C63.4-2009 that severely restricts the use of hybrid antennas for Normalized Site Attenuation and for final radiated emission measurements. These antennas have been widely used in the industry for decades and their use has not resulted in any interference issues that demand resolution. The adoption of the antenna restrictions of ANSI C63.4-2009 will force many laboratories to spend thousands of dollars on new antennas to solve a problem that does not seem to exist. If repeatable Normal Site Attenuation Measurements that comply with the range of acceptable results in C63.4 and CISPR are obtained at facilities, such as an OATS, using hybrid antennas we can see no reason that the hybrid antenna should be banned from either NSA or final measurements. Teradata requests that the restrictions on hybrid antennas in ANSI C63.4-2009 not be adopted in the FCC Rule. If the restrictions on hybrid antennas in ANSI C63.4-2009 are adopted Teradata requests that the use of hybrid antennas is allowed for NSA and final measurements when testing products to show compliance with the FCC Rules when testing at any facility, or alternatively, at an OATS.

Clause 68:

The FCC seeks comments on the concerns raised by ITI regarding the burdens that ANSI C63.4-2009 imposes over and above the 2003 version. As described in Clauses 59 and 67, we believe that the adoption of the ANSI C63.4-2009 restriction on the use of hybrid antennas represents an increased burden that is not justified by any resulting change in measured results. The increased costs come from the need to purchase new antennas, increased calibration costs (now you must have more antennas to cover the frequency range of 30 MHz-1 GHz) and increased test time as you must split a single radiated emissions test into two to cover the range with two different antennas. The benefit of these increased costs is difficult to justify when there is no demonstrated interference issue apparent in the real world to resolve. As indicated in an earlier Clause, Teradata requests that the restrictions on hybrid antennas in ANSI C63.4-2009 not be adopted in the FCC Rule. If the restrictions on hybrid antennas in ANSI C63.4-2009 are adopted, Teradata requests that the use of hybrid antennas be allowed for NSA and final measurements when testing products to show compliance with the FCC Rules when testing at any facility, or alternatively, at an OATS.

The “2 dB” rule in ANSI C63.4-2003 has been in effect in industry for many years whereby cable must be added to an EUT until the additional cable increases the radiated emission level by 2 dB or less. The adoption of the “2dB rule” in ANSI C63.4-2009 is a change and represents a significant burden. Teradata manufactures large, complex IT systems. This change renders the testing of complex IT equipment in

accordance of FCC rules nearly impossible. The wording of ANSI C63.4-2009, section 6.2.3 says explicitly that even if the addition of cables increases the emission of concern by 2 dB or less, the addition of more cables must not increase the emission level at all. As a technical statement, this last phrase is a condition that is impossible to satisfy. It is impossible to assure that an additional cable will not increase an emission by even a small fraction of a dB. This means that Teradata is forced to fully load all ports of the EUT, even when there are a very large number of ports (perhaps hundreds). This represents an extreme cost burden in EUT configuration and test time, particularly when there is no observed interference issue apparent to be resolved by this change. Teradata requests that the wording of C63.4-2003 be maintained as the FCC rule.

As discussed earlier in Clause 59, the adoption of only the $V_{SWR}$ method in C63.4-2009 for measurements above 1 GHz will force costly modifications on some test facilities that are currently complying with CISPR 22 from 1-6 GHz. It is requested that this requirement be delayed for at least 2 years to allow laboratories time to plan how to bring test facilities into compliance.