

I. TCB Program

In paragraph 18 we seek additional clarification on the TCB's roles and responsibilities and in particular, whether any TCB can dismiss or rescind any other TCB's filing or any TCB can only dismiss its own filing.

In paragraph 24, the Commission states that it will continue to accept electronic signatures. We have a concern with the type of electronic signatures that are acceptable for any up-loadable documents and seek clarification and specification of the type of electronic signatures that will be acceptable. We believe that a simple image pasting of a signature is incapable of preserving integrity and thus recommend the use of secure electronic signatures identifying the signatory's relevant data (date, location, etc.)

We also recommend that any personnel performing off-site certification duties, perform those duties under the supervision of the MRA accredited certification body and also be located in the country where accredited.

II. Post market surveillance concerns and recommendations

Under paragraph 30 we propose that the request letter for PMST samples be generated using a standard format template created by the FCC with the FCC's logo and address and with only 3 fields being edited by the requesting TCB. 1) the FCC ID of the sample being requested, 2) the ship-to-address and 3) the contact information for questions related to the sample and its accompanying supporting h/w or s/w.

We believe that this simple practice will add more credence to the request for samples and yield more applicant compliance.

APPENDIX A –Proposed Rules

Under part 2.911(c) and 2.911(e) we suggest that the Commission require that all data submitted also reflect the time and date of the data capture to help ensure data fidelity, and in the case of a transition period, to establish the instance of data capture.