

**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	)	

**REPLY COMMENTS OF THE HEWLETT-PACKARD COMPANY**

Hewlett-Packard Company (HP) is pleased to offer comments in response to thoughts filed by other parties on the above stated matter. HP's interest in this proceeding is that of a global information technology equipment and solutions provider.

**1. Measurement Standards - CISPR**

While HP did not comment on the statements in the NPRM<sup>1</sup> regarding CISPR 22, HP does agree with CISCO<sup>2</sup> that CISPR 22 should not be rejected at this time, and with both TIA<sup>3</sup> and CISCO that the Commission should keep open the door to allow further discussion. HP agrees the ability to use international standards to demonstrate

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<sup>1</sup> See NPRM paragraph 68; <http://apps.fcc.gov/ecfs/document/view?id=7022121958>

<sup>2</sup> CISCO Systems, Inc. comments of June 17, 2013, page 15;  
<http://apps.fcc.gov/ecfs/comment/view?id=6017450694>

<sup>3</sup> Telecommunications Industry Association comments of June 17, 2013, page 16;  
<http://apps.fcc.gov/ecfs/document/view?id=7520920010>

compliance with the Commission's requirements would allow test processes to be streamlined and costs reduced.

Both CISCO and TIA observed that Industry Canada (IC) has provided for use of CISPR 22 in meeting Canadian requirements. In the last two issues of ICES-003<sup>4</sup>, IC has provided for alternative paths for compliance with their emissions requirements, one based on adoption of CISPR 22 as a Canadian national standard<sup>5</sup>, and the other path essentially based on FCC limit values and test methods.<sup>6</sup> HP appreciates the fact that the FCC has already incorporated the conducted emissions limit values from CISPR 22 into the rules and provides for use of the radiated limit values from 30 MHz to 1 GHz values from CISPR 22 as an alternative<sup>7</sup> in complying with the FCC rules. With the recent publication of CISPR 32<sup>8</sup>, HP encourages the Commission to propose referencing CISPR

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<sup>4</sup> ICES-003 issue 4 dated February 2004 "Interference-Causing Equipment Standard – Digital Equipment" with EMCAB-3 issue 4 dated December 2005 "Implementation and Interpretation of the Interference-Causing Equipment Standard for Digital Apparatus, ICES-003. Both were both replaced by ICES-003 issue 5 dated August 2012 "Interference-Causing Equipment Standard – Information Technology Equipment (ITE) – Limits and methods of measurement. <http://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf00020.html>

<sup>5</sup> CAN/CSA-CEI/IEC CISPR 22:02 which is CEI/IEC CISPR 22:1997 with modifications referenced in ICES-003 Issue 4 and CAN/CSA-CISPR 22:10 which is CEI/IEC CISPR 22:2008 with modifications referenced in ICES-003 Issue 5.

<sup>6</sup> EMCAB-3 issued by Industry Canada in 2005 as guide to ICES-003 Issue 4 in the Q&A 11 stated "...Industry Canada will until further notice continue its policy of accepting FCC Part 15 compliance toward compliance with ICES-003..." Section 3 of ICES-003 Issue 5 references the ANSI C63.4 standard as an alternative test method to be used with the limit values in Section 6. Those limit values and measurement distances are essentially those in the 47CFR Sections 15.107 and 15.109(a) and 15.109(b) of the current FCC rules.

<sup>7</sup> CISPR 22 radiated emissions limit values and measurement distances as an alternative, see 47CFR Section 15.109(g).

<sup>8</sup> CISPR 32 "Electromagnetic compatibility of multimedia equipment – Emission requirements" dated 2012-01 with corrigenda of March 2012 and August 2012. [http://webstore.iec.ch/webstore/webstore.nsf/Artnum\\_PK/46055](http://webstore.iec.ch/webstore/webstore.nsf/Artnum_PK/46055)

32 for the test methods and limits up to 6 GHz for those products in the scope of the CISPR standard as an alternative to the existing FCC requirements.

## **2. Measurement Standards – ANSI C63.4-2009 and ANSI C63.10-2009**

HP appreciates the thought put into the comments filed by American National Standards Institute Accredited Standards Committee C63<sup>® 9</sup> and offers additional comment on three topics.

**A. Normative references to other standards with no date** – HP supports the C63<sup>®</sup> decision to reference standards which are not produced by C63<sup>®</sup> by date. HP disagrees with the C63<sup>®</sup> assertion there is no need to reference other C63<sup>®</sup> published standards by date because C63<sup>®</sup> will carefully consider the impacts and set transitions associated with changes they make in the standards they produce. This expressed due care does not address the fact that an amendment to, or a new edition of an undated standard referenced in a C63<sup>®</sup> standard which is referenced by the FCC for regulatory purposes has the appearance of being effective immediately for regulatory compliance upon its publication. For the reasons stated in the HP comments filed June 17, 2013<sup>10</sup> HP continues to request that sections in the rules which reference the ANSI C63.4-2009 and ANSI C63.10-2009 standards include a list of dated standards replacing those

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<sup>9</sup> C63<sup>®</sup> comments of June 17, 2013: <http://apps.fcc.gov/ecfs/document/view?id=7520919853>

<sup>10</sup> HP comments of June 17, 2013: <http://apps.fcc.gov/ecfs/document/view?id=7520919926>

which are undated in the Normative references clause 2 of the ANSI C63.4-2009 and ANSI C63.10-2009 standards.

- B. **Hybrid Antennas** – HP appreciates the C63<sup>®</sup> recommendation that the Commission include the use of hybrid antennas in this rulemaking. Given that hybrid antennas have been used for measuring compliance with the FCC rules, HP recommends any conditions regarding demonstration of hybrid antenna performance as similar to other antenna types used for compliance measurement be addressed in general terms.
- C. **“2 dB rule” in C63.4-2009** – HP is encouraged that C63<sup>®</sup> plans to review this during a future revision of C63.4. For the reasons noted in HP’s previous comment and those provided by ITI and IBM, HP believes that if the FCC does reference C63.4-2009 in the regulations, the FCC should include language in Section 15.31(a)(4) and Section 15.38(b)(6) that effectively replaces the language for port loading in the 2009 edition with the language from the 2003 edition of ANSI C63.4.

### **3. Transition Periods**

As a manufacture of many different digital products leveraged in from design platforms, HP is supportive of the suggestions made by Inovonics Wireless Corporation<sup>11</sup> regarding long transition periods for implementation of new standards when the purpose of the new standard is to improve consistency in qualification testing rather than address

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<sup>11</sup> Comments of Inovonics Wireless Corporation dated June 17, 2013, <http://apps.fcc.gov/ecfs/document/view?id=7520919859>

a problem originating from the use of products that are compliant to the current FCC requirements. A long transition period for products would allow manufactures to continue leverage new product models from those existing hardware platforms designed for a relatively long manufacturing life. For platforms with shorter manufacturing lives, the longer transition period accommodates component changes without the need to invest in product redesign because of test results being due to differences in the test specifications from one edition to another edition of the test standard.

Respectfully submitted,



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Date: July 31, 2013