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*Via Electronic Filing (http://apps.fcc.gov/ecfs/)*

November 10, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, DC 20554

Re: *PS Docket Nos. 12-94, 06-229; WT Docket No. 06-150; ET Docket No. 13-44; RM-11652; RM-11673*

Dear Ms. Dortch:

On Friday, December 6, 2013, the Telecommunications Industry Association ("TIA") met with Federal Communications Commission's ("Commission") Office of Engineering and Technology Laboratory ("OET Labs") staff at at the OET Laboratory located at 7435 Oakland Mills Rd, Columbia, MD 21406. The purpose of this meeting was for TIA to discuss the issues detailed in the attached presentation slides. Specific to the above-referenced open dockets, during this meeting, TIA discussed:

- The Commission's October 28, 2013-issued Second Report and Order containing technical rules for the 700 MHz broadband spectrum licensed to the First Responder Network Authority, which lifted the freeze on device certifications, paving the way for certification of devices in Band 14.[1] TIA attendees encouraged the Commission to work towards publishing such rules in the Federal Register, and issuing related Knowledge Database ("KDB") guidance for stakeholders, as quickly as possible.
- TIA's pending petition requesting that the Commission commence the regulatory process to allow for the optional use of eLabeling for equipment manufacturers and vendors.[2] TIA urges the Commission to address physical labeling inefficiencies and to address TIA's pending petition in this matter as quickly as possible.

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[1] Implementing Public Safety Broadband Provisions of the Middle Class Tax Relief and Job Creation Act of 2012; Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band; Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, *Second Report & Order* (Oct. 28, 2013).

[2] TIA's Petition for Rulemaking requesting the optional allowance of electronic labeling for ICT equipment, along with supportive statements from other stakeholders, can be viewed on the Commission's webpage for the relevant open rulemaking docket. *See* http://apps.fcc.gov/ecfs/proceeding/view?name=RM-11673.

In attendance were: Brian Scarpelli, TIA; Doug Sproel, TIA; Ben Botros, Panasonic; Mary Brown, Cisco; David Case, Cisco; Patrick Sullivan, Harris Corporation; Chuck Eger, Motorola Mobility; Chuck Powers, Motorola Solutions; John Forrester, Qualcomm; Roy McClellan, Cassidian Communications (via conference call); Praveen Rao, Fujitisu (via conference call); Robert Paxman, Intel (via conference call); Mike Ramnath, Motorola Solutions (via conference call); Robert Kubik, Samsung (via conference call). Attendees from the Commission were: Rashmi Doshi, OET Laboratory Division Chief; William Hurst OET Laboratory Division Technical Research Branch Chief; and Tim Harrington, OET Laboratory Electronics Engineer.

Pursuant to the Commission's rules,[3] this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: */s/ Brian Scarpelli*
Brian Scarpelli
Senior Manager, Government Affairs

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cc: Rashmi Doshi, OET Laboratory Division Chief
William Hurst, OET Laboratory Division Technical Research Branch Chief
Tim Harrington, OET Laboratory Electronics Engineer

[3] 47 C.F.R. § 1.1206.

# TIA Meeting with FCC Office of Engineering and Technology (OET) Laboratories

FCC Labs – Columbia, MD

December 6, 2013

# Agenda

- Introductions
- Background on TIA & Overview of TIA's Technical Regulatory Policy Committee (TRPC)
- Discussion
  - Various Draft/Final KDBs
  - Change of ID Proposal
  - Confidentiality of FCC Grant Authorizations
  - eLabeling
  - Shutdown and Device Approval
  - FCC Timeline/Next Steps re: Band 14 Device Approvals
  - April TCB Council Workshop
- Other?
- Adjournment

# Various Draft/Final KDBs

- **Draft Revision Proposal for KDB 248227 (*SAR measurement for IEEE 802.11 transmitters*)**
- ***SAR Evaluation Considerations for Wireless Handsets***

# Change of ID Proposal

## Background

Currently it is presumed when a Change of ID is granted for an originally modular approved device, the new Change of ID FCC ID must be displayed on the modules that are operated under the Change of ID grant approval.

# Change of ID Proposal

**Problem Statement**

Being required to change the FCC ID from the original modular approval to the new FCC ID under Change of ID is an arduous endeavour for either the module manufacturer or the OEM integrator.

For module manufacturers the device label which contains product specific information is an integral part of the product and manufacturing process (BOM) and therefore requires manufacturers to create and maintain a separate SKU for every OEM Change of ID approval.

# Change of ID Proposal

**Problem Statement (cont.)**

This has a significant impact to cost for SKU BOM management and high volume production assembly. For OEM integrators it is an equally arduous and costly effort to receive modular devices with the original FCC ID from manufacturers and then be required to modify the module labelling with the Change of ID prior to use in production host assembly and integration.

# Change of ID Proposal

**Problem Statement (cont.)**

The need to re-label the module with the new Change of ID is such an expensive and onerous exercise that, OEMs prefer to choose the full system approval path with new FCC ID. This defeats the purpose of modular approvals and creates additional applications going through the system, unnecessary time and costs on full system approvals.

The Full System approval process does not seem to be the solution for Module labelling as the module will still bear the original module vendor ID. This has no relevance to the certified ID on the product with no traceability between the two IDs.

# Change of ID Proposal

**Current Labelling**
**Class II Permissive Change**

Label on Host:

WLAN

Product:
Part No:

Contains WLAN&BT
FCC ID : ABC-123456

This device complies with Part 15 of the FCC rules.
Operation is subject to the following two conditions :
(1) this device may not cause harmful interference, and
(2) this device must accept any interference received, including interference that may cause undesired operation.

Label on module:

Not all Module manufacturers allow OEMs to use this method

# Change of ID Proposal

**Current Labelling**
**Full System Certification**

Label on Host device:

WLAN

Product:
Part No:

FCC ID : XYZ-Tablet123

This device complies with Part 15 of the FCC rules.
Operation is subject to the following two conditions :
(1) this device may not cause harmful interference, and
(2) this device must accept any interference received, including interference that may cause undesired operation.

Label on module:

The current Full System certification allows different FCC IDs between module and the host

# Change of ID Proposal

**Proposal for an Alternative to Relabeling Modules under Change of ID**

Allow modular device to display the FCC ID of the original modular vendor approval grant when the module is integrated into a host device by the OEM and operating under a Change of ID.

The OEM host platform shall be required to display the Change of ID FCC ID information either on an externally visible label or by electronic labelling according to KDB 784748.

# Change of ID Proposal

**Proposal for an Alternative to Relabeling Modules under Change of ID (cont.)**

The host device user guide shall also contain the Change of ID with a cross-reference to the original module FCC ID and original filing date for ease of traceability and must include all other required module integration information regarding compliance.

The Change of ID grant of authorization shall be required to include the original module FCC ID and original filing date in the grant notes for traceability.

# Labelling Solutions

## Option # 1

WLAN

Product:
Part No:

ID Change Certification:
FCC ID : XYZ-123456

This device complies with Part 15 of the FCC rules.
Operation is subject to the following two conditions :
(1) this device may not cause harmful interference, and
(2) this device must accept any interference received, including interference that may cause undesired operation.

## Option #2

WLAN

Product:
Part No:

Contains:
FCC ID : ABC-123456
ID Change Certification:
FCC ID : XYZ-123456

This device complies with Part 15 of the FCC rules.
Operation is subject to the following two conditions :
(1) this device may not cause harmful interference, and
(2) this device must accept any interference received, including interference that may cause undesired operation.

Grant of Equipment Authorization Notes:

The Change of ID grant of authorization includes the original module FCC ID and original filing date in the grant notes for traceability.

| | | |
|---|---|---|
| Original Module | FCC ID : ABC-123456 | 27/10/2012 |
| ID Change Certification | FCC ID : XYZ-123456 | 10/05/2013 |

Host device user guide shall also contain the Change of ID with a cross-reference to the original module FCC ID and original filing date for ease of traceability

# Change of ID Proposal

**Rationale**

The host label which is visible to users (general public) would always show the FCC ID granted under Change of ID. Ease of traceability between the Change of ID and the original module FCC ID remains intact by providing information both in the host device user guide and the FCC Change of ID grant notes.

No impact to product technical requirements or device operation and compliance.

# Change of ID Proposal

**Impact**

It is more appealing for OEM integrators to take advantage of the Change of ID approval process allowing for faster TTM and reduced cost for host manufacturers as the radio testing and documentation for a full system approval can be replaced by change of ID and Class II permissive change process with Traceability.

Reduced cost for manufacturers and/or OEM integrators associated with SKU management or high volume production operations.

# Change of ID Proposal

**Impact (cont.)**

When OEMs can use this change of ID process instead of full system approval, documentation is reduced, which leads to reduction in uploads to TCBs and the FCC which in turn reduces review time, costs and administrative burdens on all parties.

# Change of ID Proposal

**The same solution applies to another problem situation**

- For Tablets with Proximity Sensors for power reduction, KDB 616217 Section 6.5 recommends to use Unique FCC ID for each Tablet device.
- If the same Modularly certified Radio module is used in many of these Tablets, each Tablet has to be certified as a "Full System" in order to have a Unique FCC ID.
- With the Tablet having a 802.11abgn+Bluetooth+WWAN, this Full System certification process will require multiple composite Submissions repeatedly for the same Radio modules even if there is no change in existing configurations.
- Instead, if a Change of ID process is used, the same Radio module will be required to be re-labelled as many times as the number of Tablets. Each re-labelling of the Radio module is a separate SKU.

# Change of ID Proposal

Tablet Model # 1

WLAN+BT

First Stage of Certification for WLAN+BT only

- Change of ID from WLAN+BT Module vendor ID
- C2PC submission for WLAN+BT

Tablet Model # 1.1

WLAN+BT WWAN

Same Model Tablet with addition of WWAN

Second Stage of Certification for WWAN and colocation with WLAN+BT

- Change of ID from WWAN Module vendor ID
- C2PC submission for WWAN with colocation

# Change of ID Proposal

| Tablet Model # A | Tablet Model # B | Tablet Model # C |
|---|---|---|
| WLAN+BT WWAN Config#1 | WLAN+BT WWAN Config#2 | WLAN+BT WWAN Config#3 |

- Same WLAN+BT module certified in all Tablet models
- Same WWAN module in all Tablet models but configs are different due to power reduction

Full System Cert for each of the Tablets means multiple 731s for each tablet
Unnecessary repetition for the same Radio Module, laborious and expensive

Change of ID process is the best method **if** we don't have to
Keep relabelling the same module creating additional SKUs each time

If there are 10 Tablet models in 2 years using the same Module this means 10 SKUs of the Same identical Module

# Confidentiality of Grant Authorizations

- **For grant authorizations, the FCC should consider giving automatic confidentiality rather than require a request from the manufacturer.**
- **Who has the standing to challenge grants?**

# Electronic Labeling

- **Background:**
  - **In August 2012, TIA formally petitioned the FCC to allow for the non-exclusive option of electronic labeling.**
  - **In short, we believe that this option would ease technical and logistical burdens on manufacturers while increasing end user access to useful information about their devices.**
  - **The item was later put on Public Notice, and saw no opposing comments. It has not yet been assigned a docket number.**
  - **This request was not addressed under the broader docket for device approval process reform, though TIA requested that in its comments for that matter.**
- **TIA believes that the FCC should move forward as quickly as possible to address the requested non-exclusive allowance of eLabeling in the United States.**
- **Can TIA provide anything further to address concerns, speeding the regulatory process in this matter?**

# Shutdown and Device Approval

- **TIA is working now to address the effects of the shutdown on device approval.**
- **We envision a solution that includes a limited waiver of 47 CFR 2.913 (online filing requirement) and 2.923 (the 30 day period that runs from authorization for challenge) until the government shutdown ends.**
- **In the long term, we are asking that the FCC consider the possibility that non-PBA and non-exclusion list grants be allowed to be self-certified.**

# FCC Timeline/Next Steps re: Band 14 Device Approvals

- **During October 28's FCC Open Meeting it adopted a Second Report and Order containing technical rules for the 700 MHz broadband spectrum licensed to the First Responder Network Authority.**
- **In this R&O the FCC lifted the freeze on device certifications, paving the way for certification of devices in Band 14.**
- **Can the Labs provide insight into next steps/timeline?**

# April TCB Council Workshop

- **Priorities**
- **Topics for TIA to address**

# Other?

# Thank You!

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