

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  
Amendment of Part 68 regarding ) RM-11652  
Approval of Terminal Equipment by )  
Telecommunications )  
Certification Bodies )

**EX PARTE COMMENTS**

The American National Standards Institute Accredited Standards Committee C63® (“ASC C63®”) submits these additional Ex Parte Comments in the above-captioned Federal Communications Commission (“Commission”) proceeding.<sup>1</sup> Last year, ASC C63® submitted Comments and Reply Comments in this proceeding which (i) supported the proposal to update the Commission’s rules to cross reference the standards known as ANSI C63.4-2009: “*Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz*” (“C63.4-2009”) and ANSI C63.10-2009: “*American National Standard for Testing Unlicensed Wireless Devices*” (“C63.10-2009”); and (ii) advised the Commission that further updated versions of both C63.4-2009 and C63.10-2009 were expected to be published later in 2013. With respect to the C63.10-2009

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<sup>1</sup> In the Matter of Amendment of Parts 0,1, 2, and 15 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment and Amendment of Part 68 regarding Approval of Terminal Equipment by Telecommunications Certification Bodies, ET Docket No. 13-44, RM-11652, *Notice of Proposed Rulemaking* (rel. February 15, 2013) (“NPRM”).

standard, ASC C63® submitted Ex Parte Comments in January 2014 advising the Commission that an updated version of the standard, *i.e.*, C63.10-2013, was published in late 2013 and asking the Commission to update its rules to cross reference this 2013 version.

ASC C63® is submitting these additional Ex Parte Comments because an updated version of the C63.4 standard was just published last week. As discussed more fully herein, ASC C63® respectfully requests that the Commission update its rules to cross reference the 2014 version of the C63.4 standard, rather than the 2009 version. To be clear, while ASC C63® seeks a prompt update to the 2014 version of this standard, ASC C63® urges the Commission not to further delay replacing the 2003 version of C63.4 (or the 2003 version of C63.10) with those published in 2009 as it considers incorporating the most current versions of the standards into the Commission's rules.

## **Background**

ASC C63® is a voluntary standards making organization accredited by the American National Standards Institute, Inc. with the Institute of Electrical and Electronics Engineers, Inc. as the Secretariat. ASC C63® has been an American consensus body for over 50 years. ASC C63® meets the ANSI requirements for balanced representation of its membership. The balance ensures that all parties are represented including government organizations (including the Commission), manufacturers, test laboratories and other professional organizations. This close cooperation between government and industry has resulted in the "incorporation by reference" of a number of voluntary test procedure standards into the Commission's rules.

ASC C63 continually strives to update and improve its standards to reflect changes in technology and to promote the public interest. Among other things, the technical improvements of new standards will

promote testing accuracy, repeatability and reproducibility of test results. However, these benefits are often not fully realized when there is a significant delay in incorporating new standards into the Commission's rules. For these reasons, ASC C63® is submitting these additional Ex Parte Comments in an effort to keep the Commission's rules as current as possible with relevant consensus standards. ASC C63® recognizes that the Commission must follow certain procedures before incorporating this new standard into the Commission's rules. However, ASC C63® urges the Commission to take appropriate steps as quickly as possible.

### **C63.4-2014 Standard**

C63.4-2014, entitled "*American National Standard of Procedures for Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz*," was published on June 20, 2014 ("C63.10-2014"). It supersedes C63.4-2009, which contained procedures for determining compliance of a wide variety of intentional and unintentional radiators. In both its Comments and Reply Comments in this proceeding, ASC C63® asked the Commission to require compliance with the C63.4-2009 (rather than the outdated C63.4-2003 version).

However, the C63.4-2014 standard further improves various aspects of the C63.4-2009 standard. For example, some more significant changes to the standard include the following:

1. Addition of a new test-site specific hybrid antenna qualification procedure as detailed in Annex N of the standard;
2. Removal of paragraph 13 on the testing of transmitters as that criteria has been previously published in C63.10 – 2013 – *American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices*;

3. Addition of a new Informative Annex to provide information about the application of this standard in the United States and Canada (Annex I);
4. Some additional improvements to the “2dB rule”; that is, relative to the number of additional cables to be added to identical ports may be limited using a process called the *2 dB rule*;
5. Addition of information on test setup details for “Tablet PCs;”
6. Addition of test site validation interval guidelines for radiated emission sites above 1 GHz;
7. Modification of details on the “RF absorber ground plane” for radiated emission measurements above 1 GHz relative to  $S_{VSWR}$  site qualification procedures;
8. Recommendations for visual display information based on the size of the “screen;”
9. Further clarification on radiated emission testing relative to the “aiming” of antennas at the source of emissions and the requirement for full-height scan for emission maximization.

C63.4-2014 goes beyond what is contained in C63.4-2009 and, consequently, ASC C63® believes it is in the public interest for the Commission to “incorporate by reference” C63.4-2014 into the Commission’s rules.

## **Conclusion**

We thank the Commission for this opportunity to share our additional comments in this proceeding. As noted herein, the updated C63.4 standard incorporates numerous improvements to the prior standard. ASC C63® recommends the “*incorporation by reference*” of the new version of the standard into the Commission’s rules as soon as possible.

Respectfully submitted,

**American National Standards Institute  
Accredited Standards Committee C63®**

/s/ Mr. Daniel Hoolihan

Chairman,  
American National Standards Institute  
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June 29, 2014

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