



# Publication Updates and Administrative Notes

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Note: The views expressed in this presentation are those of the authors and may not necessarily represent the views of the Federal Communications Commission

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TCB Workshop



# Publication Updates

## ➤ **511808 D01 C-V2X Waiver v01r0:** 6/21/2024

- New Grantees Added 07/21/2024: DA 24-707: Autotalks, Innowireless, Keysight, Subaru.

## ➤ **987594 U-NII 6 GHz Devices:** 10/10/2024

- 987594 D01-F U-NII 6GHz General Requirements v03:
  - VLP and clarification for section 11 for PIA
- 987594 D02-F U-NII 6 GHz EMC Measurement v03
  - Checklist items were updated for VLP.
- 987594 D03-F U-NII 6 GHz QA v03
  - Checklist items were updated for VLP
- 987594 D04-F UN6GHZ Pre-Approval Guidance Checklist v03
  - Checklist items were updated for VLP, and some items were removed.



# Publication Updates

- **996369 Module Certification:**
  - 996369 D01 Module Certification Guide v04r01: 10/11/2024
    - Clarified that Client-licensed-service modules antennas do not need to meet 15.203 and 15.204.
    - Clarified LMA 2.2.4 Antenna LMA for Professional Host Installation.
  - 996369 D02 Module Q&A v02r01 Clarification to question. 10/11/2024
- **273109 Part 25 D02:** 10/4/2024
  - Clarified that the expiration of the temporary waiver process will be announced in a public notice.
- **986446 Covered Equipment Guidance:** 08/28/2024
  - D01 Adding new guidance item 2a, removing obsolete data from the introduction, and adding clarifying language to item 1.a.ii.
- **388624 D02 Pre-Approval Guidance List v18r06:** 10/11/2024
  - PAG Item AGGREG and the Appendix AGGREG checklist have been removed.



# Administrative Notes

## 6 GHz PIA Geolocation Requirement

- **Persistent Inquiry Acceptance (PIA)** is a pre-approval procedure that, after acceptance, can be used as exhibits for each application to demonstrate compliance with geolocation accuracy for standard Access points (6SD) and fixed clients (6FC) devices.
- **6SD and 6FC devices** must be authorized to transmit in the UNII 5 and UNII 7 bands by an FCC-approved Automated Frequency Coordination (AFC) database.
- **6SD and 6FC** require providing the AFC through a secure API internet link, the device's geolocation, and an area with a 95% confidence level that the device is within that area.
- The PIA demonstrates an applicant's method to **provide location within the 95% confidence level**,
- To submit the PIA, use the first category, "**Equipment Compliance Review**," and the second category, "**Persistent Inquiry Acceptance**."
- Submit two documents:
  - **Geolocation General Description**, see 987594 D01 section 11.2.1
  - **Geolocation Justification Report**, see 987594 D01 section 11.2.2
- We encourage the applicant or a third party providing the solution that best understands their geolocation system and method to submit the PIA.



# Administrative Notes

## 6 GHz PIA Geolocation Requirement

- **Geolocation General Description** 987594 D01 section 11.2.1
  - Provide a narrative to describe the general overview for the 95% confidence area. Only short-term confidentiality is permitted.
- **Geolocation Justification Report** 987594 D01 section 11.2.2
  - A. Required for All PIAs
    - 1. A **narrative description of the geolocation system**; how the coordinates are obtained; and the justification of how the location uncertainty (in meters) was determined.
    - 2. **Describe the testing done** to verify the 95% confidence level claim
  - B. **May be included** in PIA if relevant.
    - 1. Contacting the AFC (flow chart is acceptable)
      - a) At initial operation.
      - b) After power cycles.
        - optional section to demonstrate that the device did not move after a power cycle
      - c) Contact the AFC and be reauthorized at least once per day
    - 2. How is Antenna height above ground determined.



# Administrative Notes

## 6 GHz PIA Geolocation Requirement

- If the PIA does not include the “May be included”, (B) these exhibits must be submitted as attestation descriptions for each application.
- This PIA 264531 is accepted as the applicant’s declaration that devices using this method (described in the general Description and justification report documents) comply with the geolocation requirements.
- GNSS signals must only be received from **U.S. licensed Satellites or approved satellites** under 47 CFR § 25.137. Example: GLONASS and BEIDOU are not permitted.
- The accepted PIA consist of four documents which are used as exhibits by the TCB for the 731 application.
  1. **11.2.1 Geolocation General Description** – provided by the applicant.
  2. **11.2.2 Geolocation Justification.** An optional section may be provided to demonstrate that the device did not move after a power cycle -provided by the applicant.
  3. **Acceptance Letter-** FCC conditions of acceptance - provided by the FCC.
  4. **PDF copy of the inquiry** -provided by the FCC.



# 100% HAC Report and Order

- **The Commission will consider a Report and Order adopting a 100% HAC requirement**
  - ❖ October 2024 Commission Meeting
- **If adopted, the draft Order would require:**
  - ❖ **Between the R&O adoption date and 24 months after Federal Register publication.**
    - At least 85% of the total number of handset models offered must meet acoustic coupling (RF interference), telecoil, and volume control (waiver standard acceptable). No Bluetooth coupling requirement.
  - ❖ **Between 24 months and 48 months after Federal Register publication.**
    - 100% of handset models must meet acoustic coupling (RF interference), volume control (either waiver standard, if in effect, or new TIA 5050 standard if adopted), and 85% telecoil/15% Bluetooth (either proprietary or non-proprietary).
  - ❖ **48 months after Federal Register publication.**
    - 100% of handset models must meet acoustic coupling (RF interference), volume control (either waiver standard, if in effect, or new TIA 5050 standard if adopted), and 85% telecoil/15% Bluetooth (non-proprietary only).



# Administrative Notes

## FCC ID Labelling & Importation

- Customs inspects goods and many have transmitters (such as Bluetooth) but the goods do not have an FCC ID label on the device or a temporary label if it uses e-labeling:
  - Lawn mowers, Golf Carts
  - Bed mattresses
  - Underwear
  - Speakers, Home automation etc.
- Many of these devices have a certification but for some reason they disregard labeling”
  - § 2.925 Identification of equipment.
  - § 2.935 Electronic labeling of radiofrequency devices.
  - 47 CFR 15.212(a)(1)(vi) (A) (B) - Modules
- FCC responds to customs ”Return to the country of origin”.
- Labs should emphasize the importance of labelling a product.





Questions?

THANK YOU

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