

ATIS comments cited

Obsolete Technical Rules Call Generates Suggestions From CTA, CTIA, ITI and Many Others

The FCC Office of Engineering and Technology's looking for input on the Technological Advisory Council's hunt for technical regulations in need of modification (see [1708310035](#)) got suggestions on new filing requirements for internal reorganizations and reforming rules on marketing and operation of RF devices before authorization. Monday was the deadline for docket 17-215 comments.

Rapid wireless device innovation rendered numerous rules "either obsolete or too burdensome" given the volume of devices coming into the U.S. market, the Telecommunications Industry Association [said](#). It suggested streamlining the equipment approval procedure for dynamic frequency selection (DFS) devices, expanding the modular device approval process, issuing test procedures for millimeter wave devices and completing the RF exposure proceeding, with the agency also harmonizing its limits with international limits.

Wi-Fi Alliance wants approval of DFS-enabled products to allow re-use of test results of other parties, use of conducted tests in lieu of radiated tests in audit testing, and creation of a "Trusted Vendor Program," letting some manufacturers shown to be reliable submit devices for testing after approval. It [sought](#) relaxed or eliminated aggregate detection thresholds and conforming channel availability with EU standards.

The Information Technology Industry Council recommended the FCC reconsider its rule prohibiting marketing of RF equipment before authorization, suggesting the agency apply the prohibition to unauthorized products at time of import. ITI [said](#) the FCC should allow testing of computers and peripherals to International Special Committee on Radio Interference (CISPR) 22 or CISPR 32 standards instead of the American National Standards Institute C63.4 standard and to finish its work on the RF emissions notice of inquiry.

Also pushing for changes in RF device marketing rules, CTA [said](#) the FCC also should expand opportunities for self-certification, especially for low-power devices; treat exhibits in the certification

process as confidential; and replace the license-by-license application or notification process for pro forma transactions with an annual update or informational filing. It wants the FCC to make the experimental license system more user friendly and complained that too many filing and record-keeping rules still require paper.

CTIA, also seeking streamlined ownership filing requirements for internal reorganizations, **said** licensing procedures should let licensees re-aggregate previously partitioned or disaggregated commercial mobile service licenses. It said intramarket spectrum swaps should be treated as pro forma changes and field strength limit should be replaced with a power flux spectral density limits.

ATIS urged extending equal access and dialing parity rules to all LECs. It supported an NPRM on eliminating Form 325 filing requirements (see [1710260049](#)) and **said** Form 333 about cable operator pricing could be replaced with periodic sampling of cable operators, while 396-C, which requires MVPDs to report equal employment opportunity information, contains information typically available on providers' websites. ATIS pushed for longer deadlines for submitting outage notifications. It said reporting deadlines for non-911 related outages should be uniform and extended to 24 hours, and 911-related outage reporting deadlines should be extended or applied more flexibly.

The FCC, if it uses external groups' work in developing service rules, should establish clear guidelines for accepting those externally developed standards, the GPS Innovation Alliance **said**.

Boeing pushed for widening equipment authorization requirements to include digital processing components used in maritime vessels and creating identical exemptions for nonconsumer industrial, scientific and medical equipment and for Part 15 transmitters that operate through induction. It **said** the agency needs to update rules for testing emergency locator transmitters on aircraft and to ax its requirement that a person holding a general radiotelephone operator license must directly supervise and be responsible for an aircraft radio station installation and testing. EchoStar **said** the FCC should revise its satellite allocations and technical requirements to be more consistent with ITU international allocation rules.

Filing for licenses in bands shared by federal and nonfederal services is "slow, lacks certainty and is unduly burdensome," the Commercial Smallsat Spectrum Management Association **said**. It said FCC and NTIA coordination processes should run simultaneously and the commission should send the full applications to all implicated federal agencies. It suggested better communications between the agency and satellite applicants, such as online information showing the status of an ITU submission. And it sought streamlined ground station licensing, such as one application form and grant process applicable to C-, Ka- and Ku-band operators. SpaceX, pushed the FCC on commercial launch spectrum allocation (see [1705300054](#)), **said** such would remove a hurdle to commercial space use.

The FCC should adjust its requirement that FM translators immediately cease operation when the parent signal is shut off for maintenance or repairs, **said** the Association of Federal Communications Consulting Engineers. The National Public Safety Telecommunications Council **said** it's unaware of significant public safety technical rules "that do not serve some purpose," suggesting updating the Part 15 on unintentional radiators.