

**Federal Communications Commission  
Office of Engineering and Technology  
Laboratory Division Public Draft Review**

**Laboratory Division Draft Presentation**

**Title:** Grant Notes

**Presenter:** Mark Neumann, FCC Staff

**Presented:** TCB Workshop April 2013 Baltimore Maryland

**Purpose of Draft Presentation:**

This presentation was made to invite comments prior to any additional action related to this publication.

We invite comments:

- On the proposed clarifications.
- Areas that need to be further addressed.
- Additional questions or concerns.
- Other comments related to this subject.

Additional action may include modification to the current publication or first posting a detailed draft prior to a modification of the current publication.

**Subject of Draft Presentation:**

This presentation was made to modify KDB Publication: 634817 (Freq Range Listing for Grants) for further clarification on extended frequency grant notes.



# Grant Notes

## ● EF Grant Note

- TCBs and applicants have not been properly addressing EF grant note in applications
- The device must be capable of operating on frequencies in the appropriate US frequency band listed and authorized
  - Extended frequency band must be contiguous and permitted in the guidance
- It is not just sufficient to have a boiler plate attestation, the operational description must clearly state how the operation in the non-authorized bands are controlled
- Applications which do not clearly address how operation in non-authorized bands is controlled may be dismissed



# Grant Notes

## ● EF Grant Note (cont)

- In cases where frequency extension is applied for and also multiple rule parts appear on the grant:
  - The application must clearly show how compliance with the rule part with strictest requirements is met
  - The operational description must clearly show measures taken to not permit non-US operation
  - User manual instructions are not enough for devices sold directly to users
- We are reviewing placing further restrictions on EF grant note, among considerations:
  - Further restrict EF notes only to permit operation with joint federal use
  - Not permit EF codes where LTE bands may overlap with non-CMRS use in US
  - Propose to seek comments on these suggestions in the KDB 634817 and justification for permitting specific bands