

Section/Page	Comment
III B	<p data-bbox="375 296 1396 386">Regarding use of multi-transmitter statements, <i>“The antenna(s) used for this transmitter must not transmit simultaneously with any other antenna or transmitter, except in accordance with FCC multi-transmitter product procedures.”</i></p> <p data-bbox="375 401 1406 558">While we understand the commission’s proposal and intent for the proposed use of this clause, the colloquial understanding and current intended application of this statement differs. We agree that the manufacturer of an RF module should include information on collocation restrictions which could be reasonably expected for the type of module and its intended target market.</p> <p data-bbox="375 573 1414 894">However, this clause has also been utilized as a caution to both OEMs and the general public for any product which might be reasonably expected to be collocated with another transmitter (for example: USB dongles, or even larger finished products which have potential to be installed in close proximity to other transmitters). The intent behind this statement, as in its current use, is to clearly indicate the equipment may be subject to further assessment requirements (i.e. possible testing, or even certification filing) when the product is placed in close proximity to other transmitters; that by following the FCC’s multi-transmitter product procedures, the finished assembly may be determined compliant by any number of assessment methods as permitted by the procedure. Furthermore, this comment usurps the “no collocation” grant comment by deferring to established procedures.</p> <p data-bbox="375 909 1417 1230">The original manufacturer cannot possibly be expected to have all knowledge of how an end-user or OEM is going to utilize a product (or a module) and therefore it is an unreasonable burden to require detailed collocation instructions within application filings to address the potential plethora of unexpected collocation conditions. When detailed instructions could be provided by a manufacturer based on current FCC multi-transmitter procedures, what happens several years from now when these instructions will still be in place while the FCC’s published procedures have been updated? This leaves too many possible gaps in documentation between the applicant and the FCC’s published procedures where the applicant’s instructions may become unnecessarily overly restrictive or worse, become less restrictive than the current procedures, depending on the nature of the FCC’s procedural changes.</p> <p data-bbox="375 1245 1417 1625">The overall result of this intended use of the statement has created more discussions between the TCB and the applicant and/or OEMs when multi-transmitter issues arise. Each multi-transmitter configuration includes several unique nuances which differ from another. In many cases, further assessment was obtained and the configuration demonstrated compliance. Some cases required application filings, while some did not qualify for PCII. In a few circumstances, the OEM was required to obtain a new FCC ID because the RF Exposure configuration changed significantly. By following the established procedures, the TCB was able to provide proper guidance for the multi-transmitter product. The discussion point is that the recent use of this particular statement has not necessitated detailed multi-transmitter configuration instructions within the original filing. In most circumstances, the multi-transmitter configurations were never considered by the original applicant and thus the inquiry was raised to the TCB because the applicant or the OEM needed further clarification.</p> <p data-bbox="375 1640 1382 1862">Therefore, while we support some limited documentation on “reasonably expected” multi-transmitter configurations for RF modules, a manufacturer cannot be expected to provide detailed instructions for most of the actual uses of their product. Accordingly, we strongly encourage the commission to consider the current success of the present usage of this grant comment even without any instructions provided in the filing as evidence in support of continued use of the clause without required instructions in the filing in cases where finished products might be expected to be installed in multi-transmitter environments.</p>

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III C	<p>We support removal of the generic “no collocation” grant comment in favor of a more general text to provide an avenue of discussion for further assessment as needed. The discussion in item III B above provides such a scenario.</p>
III D	<p>We support omission of the 20cm grant condition except for RF modules where notification to the OEM or end user is necessary to ensure proper assessment procedures. This is exemplified in the general grant comment, <i>“Approved for Mobile RF Exposure category configurations. Installation in portable RF exposure category configurations (i.e. antenna to persons separation less than 20 cm) requires separate evaluation.”</i></p> <p>If the purpose of the grant comments is to provide clarification and restrictions then by omitting the notification precludes any meaning the clarification would otherwise provide. Stated another way, by simply stating “Approved for Mobile RF exposure category configurations.” May provide a colloquial meaning to OEMs and the general public that this product is acceptable for use at distances closer than 20cm due to the common, everyday definition of mobile. See thefreedictionary.com, 1a: “Of or relating to wireless communication devices, such as cell phones” and 2a “Capable of moving or changing quickly from one state or condition to another.” See also Merriam-Webster, Mobile, 1 “capable of moving or being moved” and 7 “a mobile phone.”</p> <p>While it may seem reasonable to the Commission to use the defined term Mobile as in 47 CFR 2.1091 (b), however the common reader of grants is typically not aware of this specific and exclusive definition. The more generally applicable term “mobile” which occurs 92 times in 47 CFR 2.1 Terms and Definitions implies the colloquial sense of the term; “Movable.” Therefore, we encourage the commission to consider the intended audience of the grants when applying the 20cm notation. We request that conditions such as that listed above be considered for inclusion into this KDB to ensure consistent application of rules by applicants and OEMs.</p>
D02 General	<p>While we see the benefit the commission is providing by attempting to codify common grant conditions within note codes for consistent use on grants, we fail to see the benefit of codified grant notes which do not have any bearing on line-specific entries within an application filing.</p> <p>For example, the proposed grant note in D02 C 5, note code AE, “RF exposure compliance is addressed under Sections 1.1310(d)(2) and 2.1091(c), as described in this filing.” This type of note code is generally applicable to the overall product, not just one specific line entry. Therefore, use of such a note code will very likely may be misunderstood or misapplied in the context of the overall compliance assessment of the product. Therefore, we request grant note codes be reserved only for use with line-specific entries (e.g. ND)</p>

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D02 I A 2	<p>Use of proposed note code AT: See also comments on III B and III C above.</p> <p>The commission’s purpose for providing public grant remarks is to inform the general public in a succinct manor any specific restrictions and/or notifications applicable to the product. If specific additional instructions or notifications are necessary, the OET has repeatedly reminded the TCBs that these instructions and or limitations must be included in the application filing. Therefore, use of an AT note code seems too nebulous at this time.</p> <p>If substantial information is required for notification in the application filing, then such a note code could be utilized. However, it remains unclear how and when such a comment would be used and furthermore, what content should be on the grant itself vs. in the attestation statement.</p> <p>Taking this thought to its extreme, it only seems reasonable that all grants would include only one comment, AT and that all comments, remarks, notes and conditions would be summarized in an attestation statement. This could be useful as it would provide a uniform place to provide not only concise comments however more clarification to the conditions or restrictions in place for any given grant.</p> <p>While the grant note AT seems to have promise as a viable mechanism, we do not currently agree that its use would benefit the public considering the long history of concise grant conditions listed directly on the grant itself. Retraining the general public to look somewhere else may be somewhat similar to changing the US system of measurement into MKS.</p> <p>In any case, prior to implementation of such a procedure, we request significant discussion on the applicability and use of such a note code so that the TCB community as a whole can use this note code appropriately and consistently according to established guidance.</p>
D02 I B 1-5	<p>While it may be novel to include “canned text” note codes for these particular statements, it seems to make the grant comment more onerous by requiring these note codes be applied for each and every line entry. We do not see the benefit of moving these comments to the canned text grant comments list of note codes. In all reality, it may only serve to make the list of grant note codes more cumbersome and thus more prone to errors and hence less effective.</p> <p>We request that the power output grant comments not be assigned grant note codes.</p>
D02 I B 5	<p>Regarding proposed NOTE ID 05, “Output Power is ERP and EIRP for above and below 1 GHz, respectively.” Applying such a note code to specific line item does not make sense unless there are specific instances where frequency range listings cross the 1GHz threshold for a given line entry in the equipment details section.</p> <p>If these note codes are to be applied to each line entry then we expect (in general) that the line entry itself would include frequencies which would allow exclusive use of either note code 02 or 03. Therefore it seems as if note code 05 is not needed.</p>

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D02 I J 1&2	<p>Please see comments on III B and III C above. Note codes M1 and M2 may be combined with general comments for multi-transmitter product procedures and therefore obviated. See also comments on "D02 General" above.</p> <p>In general we disagree with use of mandatory statements such as M2</p>
D02 I J 4	<p><i>"This WPAN module is approved for use with wireless handsets manufactured by the grantee only and is not approved for any other use, (Grantee Name)."</i></p> <p>This proposed text may be overly specific and could be replaced with a suitable (more generic) alternative. The grant notes applied to modules sold on the open market should be distinguished from modules obtained purely for use by the applicant. The restrictions for use / sale of a module only by the applicant may need to be considered as there currently exists a growing trend of applications of this type. However, the specifics of the restriction may only need be included in a cover letter.</p> <p>We strongly recommend use of the following or similar generic grant comment: <i>"Approval is limited to installation in devices under the direct control of the Grantee."</i></p> <p>Note: listing of the grantee name within grant comments should be avoided; if the grantee transfers control to a new name, this could create confusion within the filing. Therefore, it is more efficient to leave the generic term "grantee" since the grant itself already names the party.</p>
D02 I J, General	<p>The generally applied grant comment, <i>"Compliance of this device in all final host configurations is the responsibility of the Grantee."</i> Was not included as it is explicit within the rules. However, should this comment be applied in conjunction with modules where specific restrictions apply? Such as the example listed in D02 I J 4 above? The purpose would be as a public caution to the grantee to adhere to the restrictions of the grant; the text of modular approval rules being easy to neglect when someone non-technical and unaware of FCC requirements (e.g. marketing) is pushing to build a specific configuration which might otherwise deviate from the approved configurations.</p>
D02 I O 1&2	<p>For proposed note codes HC and HX, the grant comments further require HAC rating be listed appropriately. Can the guidance document be updated to include samples of proper HAC rating grant comments?</p>
D02 I S	<p>We don't understand the purpose or benefit of the proposed WV note code. Since the form 731 (section III) application includes grant waiver information and cover letter is required to substantiate a waiver for an application, what extended purpose would there be in further necessitate a note code? This seems as if it would only serve to make the list of grant notes more cumbersome to use efficiently.</p>

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D02 I (general)	<p>There are a few additional grant comments which could be incorporated into this KDB for the benefit and consistent use by all TCBs. Here are a couple which come to mind:</p> <ol style="list-style-type: none"> 1) Part 27.50 Height Restriction 2) EPIRB note code GM and associated grant comments: <ol style="list-style-type: none"> a. Approved for RTCM Category 1 (Float Free) when used with bracket FB4 or FBH4 b. Approved for RTCM Category 2 (Manual) when used with bracket MB4 3) C2PC comments (historically used to denote reason for PClI on grant comments) 4) Conditions where no grant comments are necessary (e.g. Part 15.225 or 15.249)?
D02 III Table 1	<p>Proposed note code AS does not make sense to utilize because the text cannot be edited by the TCB. This condition should be left as a grant comment and not given its own grant note code; the likelihood of use is very minimal simply because the condition is incomplete without actually specifying the distance. Even when specifying a distance, the equipment may be utilized in multiple configurations each with different safe distances. The listing of specific distances on the grant conditions may be overly restrictive in light of several installation options.</p> <p>If such a note code were to be utilized, we recommend applying general terms such that the compliance requirements may be inserted into the filing. In keeping with the goal and purpose of the KDB, we propose modification of the comment as follows: <i>“Equipment approved for installation and operation in §2.1091 Mobile RF exposure conditions when minimum separation distance as listed in this filing from all persons is maintained.”</i></p>
D02 III Table 2	<p>Several historically used note codes such as: 16, 17, 19, 21, 22, 23, 25 and 28 could all be replaced by generic text in note code 20. We request the specific note codes be retired in favor of a more generic approach, in keeping with the spirit and intent of this KDB.</p>
D02 III Table 2	<p>We fail to see the benefit of several grant notes such as AC and the Bx series: BC, BD, BE, BF, ... through BS, proclaiming the power variability of the equipment. We are unaware of any public benefit to listing such comments on the grant and therefore request such grant comments be retired from use.</p>
D02 III Table 2	<p>Several current grant note codes have unexplained usage, such as note code 14, 44, 80, 82, KK, NK, W, WD, YE, etc. Several of these note codes may have specific purpose for use with unique equipment requirements, however the explanation of their use may have been lost in the archives of past meeting minutes or FCC presentations. Therefore, we request the FCC provide some minimal usage guidance, especially for uncommonly applied grant notes.</p>
General Remark	<p>We noted that the general clause, “Approved for use with antenna(s) as listed in this filing.” Does not appear in the KDB. We support the omission of this clause provided that all applicable filings actually include a list of approved antennas in a publically available document (as opposed to an operational description which was held confidential.)</p>