

Hello from Sony Electronics North American Region Product Compliance. The follow are our comments to the draft KDB 996369 RF Certified Modules.

D03

1. We support the new guidance D03 that requires the OEM to give more detailed instructions to the host manufacturer and believe it will be very beneficial.
2. The use of certified modules in host products has been an efficient way to take advantage of using a product that has already been tested with a sample device without having to recertify the product, for many years. If module manufacturer installation instructions are followed and they are simple then, in most cases, it should not be necessary to consider the module when determining compliance of the host device. We propose that the module manufacturer, TCB and FCC identify modules that, because of the complexity and potential to interact with a host device, require additional testing. In this case the burden of additional testing could be limited to higher risk installations only.

D04

3.2 Frequency Spectrum to be Investigated

3. In the case where it is necessary to consider the certified module transmit frequency when determining the frequency range of measurement, we think that it would be sufficient to follow the rules in 47 CFR Part 15.33 which have a limit to the upper frequency of 5th harmonic of the highest frequency in addition to the 40 GHz limit.

3.6 Common Operational Configurations

4. In some cases it may be difficult to acquire a test set and it may be difficult to set up communication with another device. In many cases just having the transmitter on and transmitting should be enough for a spot check of compliance. Many modules and module types have been used for many years without problems. We believe that any additional testing should be limited to a confidence type check. We propose that the OEM module manufacturer clearly indicate when it is necessary to establish communication with another device for host device testing. This requirement should be limited to new technologies or technologies that have been shown to be a problem.

Editorial Comments

1. Clause 2.10 last sentence. It states that the module is not authorized to be used in a host. IF that's the case then it is not clear why a module that cannot be placed in a host is considered. Perhaps the word "not" should be deleted
" If the grantee markets their module as being Part 15 Subpart B compliant (since it also contains unintentional digital circuitry), then the grantee shall provide a notice stating that the

assembly is ~~not~~ authorized to be used in a host and assume that the host remains Part 15 Subpart B compliant without further testing.”