Federal Communications Commission
Office of Engineering and Technology
Laboratory Division

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PERMISSIVE CHANGE FREQUENTLY-ASKED QUESTIONS[1]

Question 1: If changes are made to the board layout (not including component changes) near the power amplifier output circuitry, to correct a voltage standing wave ratio (VSWR) problem for a certified Part 15 intentional radiator, is a Class II permissive change appropriate in accordance with § 2.1043? There is no change to the previously reported output power, modulation circuit, frequency determining circuitry, etc.

Answer 1: Yes, in this instance, since the output power remains identical to that previously approved, the modification may be authorized as a Class II permissive change. The output power and spurious emissions (radiated and conducted) should be retested and the test results submitted in the Class II permissive change application.

Question 2: What are the authorization procedures when changes are made to a previously approved composite device (device subject to multiple rule parts) that is subject to both certification and Declaration of Conformity (DoC)?

Answer 2: Changes to certified equipment are subject to the permissive change requirements in § 2.1043, which lists three types of permissive changes.

- Class I – Equipment changes that do not degrade the data reported to the Commission.
- Class II – Equipment changes that do degrade the data reported to the Commission.
- Class III – Changes in software for Software Defined Radio Equipment.

Except for minor cosmetic changes, most changes to certified equipment require testing to determine whether the change is a Class I, Class II or Class III permissive change. Class II and Class III permissive changes must be reported to the Commission.

The requirements for modification of equipment approved under the DoC procedure are contained in § 2.1073(d). The device is required to be retested if any modifications or changes are made that could adversely affect the emanation characteristics of the equipment. These results are not required to be submitted to the Commission.

[1] This document includes consolidation of guidance previously contained in KDB Publications 208873, 232568, 252613, 297513, 350078, 614963; the preceding KDB publications are expired.

Question 3: If there is a change made to the digital circuitry in the non-transmitter section of a device, is a Class I or Class II change required for the certified transmitter.

Answer 3: § 2.1043 allows for changes to a certified device that do not affect the characteristics that are required to be included in a certification application with filing a Class II permissive change. However, the Grantee is required to perform an evaluation to determine: (1) if the change(s) did not degrade the characteristics filed with the grant, then a Class I change is permitted; or (2) if there is a degradation, but the device is still in compliance with the appropriate rule, then a Class II application is required.

NOTE: No changes to the basic frequency determining and stabilizing circuitry (including clock or data rates), frequency multiplication stages, basic modulator circuit, or maximum power or field strength ratings shall not be performed without application for and authorization of a new grant of certification (new FCC Identifier).

Question 4: What are the FCC requirements for modifying equipment subject to Verification or Declaration of Conformity?

Answer 4: The permissive change rules in § 2.1043 do not apply to equipment authorized under the DoC or Verification procedures. § 2.953(d) for Verification and § 2.1073(d) for DoC requires the responsible party (*i.e.,* manufacturer or importer) to evaluate the changes and use their engineering judgement to determine if it a retest is required to demonstrate that the device continues to comply with the applicable technical rules.

Question 5: Can a manufacturer file a permissive change to add a cordless phone handset to a cordless phone base station that was approved without a handset, or vice versa?

Answer 5: No, transmitters approved under Certification must be electrically identical as originally granted, within variations that are permitted under § 2.1043. Using a single FCC Identifier under § 15.214 for a cordless telephone for both the base station unit and the handset is permitted only at the time of the initial application. However, because in this case the original application did not include a handset, a permissive change adding a handset is considered not electrically identical to the original application, and is not permitted. Similarly, a permissive change to add a base station where an original grant included only a handset is not permitted. Additionally, where an original grant included both handset and base unit per § 15.214, a permissive change cannot be used to add a different handset under the same FCC ID, and vice versa. Rather, for § 15.214 purposes a new FCC ID would be needed for a different handset to interoperate in the different new combination of handset and base unit devices.

Question 6: What are the equipment authorization requirements for changing a FCC certificated dual-band cellular telephone into a single-band cellular telephone?

Answer 6: If a new device version is created by removing hardware components from a multi-band device, then the device has been electrically modified and a new grant of certification is required. In addition, testing for SAR and HAC requirements for the single-band cellular phone is necessary. Disabling a band by software only without removing hardware is permitted. In this case, if the previous HAC rating was based on the newly-disabled band, and the manufacturer reports a new HAC rating under

a model variant in accordance with § 20.19, then a Class II permissive change is required. Although retesting may not be necessary, a permissive change test report and the grant comments must be filed to reflect the HAC rating of the new model.

Question 7: What is the procedure to add a new equipment class to an existing FCC ID as a result of rule changes?

Answer 7: Discussions in rulemaking documents about adding a new equipment class to an existing FCC ID typically refer to the process as a permissive change, in that such a change is permissible under the rules. In practice, a new original Form 731 application for the new equipment class is filed under an existing FCC ID, rather than filing a Class II permissive change Form 731.

a) Procedure for adding a new equipment class to an FCC ID where the original grant was issued by the FCC (i.e., EA tracking number):
   1) If FCC issued the original FCC ID as a composite equipment class Form 731, simply add new equipment class as an original Form 731 under the same FCC ID.
   2) If FCC issued the original grant as a software defined radio (SDR), simply add a new equipment class as a Class III permissive change under the same FCC ID.
   3) If FCC issued the original grant as non-composite (single equipment class only), contact the FCC to set aside and modify original grant.
      - After FCC action, a TCB can add a new equipment class under the same FCC ID.

b) Procedure for adding a new equipment class to an FCC ID where the original grant was issued by a TCB (i.e., TC tracking number):
   1) If TCB issued the original FCC ID as a composite equipment class Form 731, simply add new equipment class as an original Form 731 under the same FCC ID.
   2) If TCB issued the original grant as an SDR device, simply add a new equipment class as a Class III permissive change under the same FCC ID.
   3) If the same TCB issued the original FCC ID less than 30 days ago as a non-composite Form 731, the TCB can modify the original Form 731 to be a composite and then process a new equipment class as an original Form 731 under the same FCC ID.
   4) If the same TCB issued the original grant as a non-composite Form 731 more than 30 days ago, contact the FCC via KDB to put the original Form 731 into audit mode, then the TCB should modify the original Form 731 to be composite, then process a new equipment class as an original Form 731 under the same FCC ID.
   5) If a different TCB issued the original FCC ID as a non-composite, the grantee should contact the original TCB to modify the original FCC ID to be a composite, after which any TCB can process a new equipment class as an original Form 731 under the same FCC ID.