

Applying for US Equipment Authorisation for intentional radiators and unintentional radiators through RFI Global Services as a TCB

Summary:

This document briefly explains the process and requirements for applications to RFI Global Services Ltd. (RFI) acting as a TCB under the Telecommunications and EMC sectors of the EU-US MRA. Manufacturers of intentional radiators (i.e. licensed and un-licensed products) and unintentional radiators can obtain a US Grant of approval through RFI Global Services Ltd for products that the FCC allow TCBs to issue Grants for.

The scheme is operated under the RFI Certification scheme which implements the FCC requirements insofar as they apply to applications made to RFI. The current version of this document may be found at www.rfi-global.com. If there is a discrepancy between requirements found in this document and those found on FCC Web sites, the assumption should be that the FCC website is more accurate.

Such equipment falls within the scope of FCC 47 CFR. This scheme enables a manufacturer of product to receive a grant in order to market that product within the USA.

The scheme is operated under the RFI Global Services Ltd. Certification scheme and implements the FCC regulations as they apply to such applications made to RFI Global Services Ltd.

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1. Introduction

This document outlines the process and conditions to enable a manufacturer to apply for an FCC Grant via RFI Global Services, as a TCB, for 3 categories of equipment

- Licensed radio devices
- Unlicensed radio devices
- Unintentional radiators.

Most of this equipment is assessed under the requirements of FCC 47CFR.

Where this document may be in conflict with the FCC rules at the time of a Certification assessment, the FCC rules, including any FCC TCB specific requirements will take precedence.

1.1. RFI Global Services Ltd. TCB Scope

1.1.1. RFI Global Services Ltd has the scope of competence covering the following areas, as defined by the FCC:

Unlicensed RF devices (Parts 11, 15, 18)

- A.1** Unintentional radiators, low power transmitters
- A.2** Low power transmitters > 1 GHz
- A.3** Unlicensed PCS devices
- A.4** Unlicensed NII devices and spread spectrum

Licensed radio services (Parts 21, 22, 24 - 27, 74...101)

- B.1** Cellular and mobile: 22, 24
- B.2** General mobile: 74, 90, 95
- B.4** Microwave radio: 21, 90, 101

1.1.2. The FCC lists a range of products that TCBs cannot evaluate, these are detailed at:

<https://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=20247&switch=P>

1.1.3. Any products that do not follow the FCC rules shall need to be pre-processed via the FCC KDB (Knowledge Database) system prior to testing and TCB assessment. The KDB can be raised by the manufacturer or their agent or a test laboratory prior to the commencement of testing.

2. Type and method of application

2.1. The application must be made in the English language

2.2. There are two basic types of application

- An original application
- A change to an original application often referred to as a Class 2 permissive change.

For certain services, an applicant must approach the FCC directly, these are typically for:

- Any request to grant a waiver of the rules
- Revoking a grant after more than 30 days
- Taking enforcement actions
- Authorising the transfer of control of a grantee

2.3. For the services in 2.2 above, the application should be made through RFI Global Services Ltd customer service team. In all cases the application and supporting documentation must be in an electronic format (PDF only).

2.4. The application can be made by, or on behalf of either the manufacturer or supplier of the equipment. The applicant can authorise RFI Global Services Ltd to liaise with other parties acting on behalf of the applicant, and an example could be module integration.

3. Who to and how to apply for FCC grant (The Application) and ongoing certification

3.1. The application can start after RFI has produced a quotation, and a purchase order* has been received for the quoted work. The quote number is the unique reference for your application, and should be quoted in all correspondence to the TCB.

*Information confirming the order and with your intended method of payment. The name and address to which invoices and accounts should be sent where this differs from the person or address of the main contact listed previously (to be included with supporting information).

3.2. After RFI has received a Purchase order for the application, customer services will supply you an "Customer supplied items for RFI TCB Application" check list, a blank "RFI Global Services Ltd. form 731" and associated "RFI Global Services TCB Form 731 Instructions". You may also request a sample "agency letter", a sample "FCC confidentiality request letter" and a sample "FCC letter for module exhibit Authorisation" for guidance.

3.3. Review your application for accuracy, completeness and consistency with the requirements for an FCC Grant. Please ensure each file is less than 6Mb.

- Applicants are responsible for ensuring the accuracy and relevance of the test data and are free to choose the testing facility.
- Where submitted test data remains questionable (such as a measurement result being very close to a limit), then RFI may request a sample of the product for review.
- For Certification of devices based on 47 CFR part 15 or 47 CFR part 18, the test facility description must be on file with the FCC as required by 47 CFR 2.948.

3.4. RFI will advise the applicant (or the technical contact where one is identified) of any omissions and/or shortfalls against the requirements stated by the FCC; further work on that application may be suspended until a satisfactory response is received.

3.5. If there is a significant deficit (lack of detail, incorrect data etc.) which either cannot be remedied, or where the remedy is not submitted in a timely fashion, RFI Global Services Ltd. may dismiss the application and may charge a proportion of our fee which is proportional to the time taken during the assessment.

3.6. After the application has been successfully reviewed by an RFI Global Services Ltd. decision maker, the process will continue by uploading the FCC required exhibits (including any confidentiality requests, and these associated files will be marked confidential where allowed by the FCC rules) to the FCC web site and ends with the grant being issued on the FCC website.

3.7. If RFI Global Services Ltd are unable to make the finding specified in 47 CFR 2.915, the application may be denied (in accordance with 47 CFR 2.919)

3.8. The FCC will formally advise (to the email address supplied on the RFI Global Services Ltd TCB form 731) the granting of equipment authorisation.

3.9. Where the TCB has assessed the application as not meeting the requirements set by FCC (rejection of grant), the Applicant will be informed by email of the TCB decision. The Applicant can request the TCB to reconsider the application, within 10 working days of being notified by the TCB of the rejection of certification, based on:

- Referencing documents or other exhibits which were submitted as part of the application and a letter of explanation. This re-assessment is performed at no additional cost.
- Referencing new documents or other new exhibits which were not supplied as part of the application. This re-assessment is performed at additional cost which will be a minimum of 25% of the application quote.
- Request a review via the FCC KDB system.
- Request a review to be overseen by the RFI Group Quality Manager

3.10. The issued certificate will be valid as long as the grant is published on the FCC web site.

Any certificate issued by RFI may be immediately suspended or withdrawn by RFI if:

- The markings are abused by the certificate holder
- Complaints are received from purchasers regarding certified and marketed products and these complaints are substantiated by supplementary examinations that reveal non-compliances or
- It was granted on the basis of false or misleading data or documentation or
- Withdrawal is requested by the certificate holder

3.11. Any certificate expires when:

- It is replaced by another certificate or
- The certificate is withdrawn by RFI or the FCC.

3.12. The certificate holder is informed of the intended or actual suspension by email and where possible by telephone. In such case the manufacturer may no longer place the product on the market until all outstanding issues have been resolved to the satisfaction of the TCB and FCC.

4. Application for an original equipment authorisation

4.1. Forms “RFI Global Services TCB Form 731” along with the documents detailed in checklist “Customer Supplied items for RFI TCB Application” must be submitted

4.2. “RFI Global Services TCB Form 731 Instructions” shall be followed when filling in the “RFI Global Services TCB form 731”. This document includes details for applying for FCC Registration Number (FRN), Grantee Code and the format of the Equipment Product Code.

4.3. A checklist “Customer supplied items for RFI TCB Application” will be supplied with details of the additional exhibits that are required for us to assess the application.

4.4. Sample “FCC Confidentiality request letter” and “Agency letter” and “FCC letter for module exhibit Authorisation” are available on request for any confirmed application.

5. Application for a change to an authorised product or to the details on the product grant.

5.1. Changes to an authorised product

All Changes have to be assessed by the Manufacturer. A change in the Grant or other information is required for some categories of change while others only require the manufacturer to formerly hold evidence of continuing compliance. FCC 47 CFR 2.932 and 2.1043 deal with changes to authorised equipment. The following sections summarises the requirements.

5.2. Class 1 Permissive Changes

These include those modifications to the equipment which do not degrade the characteristics reported in the application to a TCB (or FCC). No additional filing is required for such changes; the manufacturer must keep records and make these available to the TCB who made the last grant for the equipment or to the FCC, on request.

5.3. Class 2 Permissive changes

These include those modifications which degrade the performance as reported with the application but still meet the minimum requirements of the applicable rules. Changes to the transmitter power levels will normally require a new application. Class 2 permissive changes can include the addition of replacement or alternative Antennas for part 15 devices, and additional hosts for limited modular approvals.

5.4. Application

RFI Global Services Ltd. are able to progress permissive changes within our scope of appointment, whether or not we assessed the original application. In the case where RFI Global Services Ltd. have not previously progressed an application (either as an original or as a Class 2 permissive change) for this product, a fully completed version of “RFI Global Services Ltd TCB Form 731” is required. Where RFI Global Services Ltd. have previously progressed an application (as an original or as a Class 2 permissive change) and a RFI Global Services Ltd. TCB reference has been provided for this product then please contact the RFI TCB for assistance.

5.5. Confidentiality

Where you require certain exhibits to be treated as short or long term confidential you must include a confidentiality request addressed to RFI Global Services Ltd. . All Class 2 changes must, if confidentiality is required, include specific a confidentiality request within the exhibit s previous requests cannot be carried over Furthermore where the FCC (or another TCB) have issued a grant supported by confidential information RFI Global Services Ltd. may require copies of those documents to enable the evaluation of the Class II change to progress. If in doubt either enclose duplicate copies of the documents (to permit RFI Global Services Ltd. access to them) or hold them in readiness.

5.6. Submission Timing

- Filings by all TCBs are subject to a 30 day audit period, during which time the FCC may audit the submission and can require further clarification. We recommend that permissive changes are not made within this 30 day window. the previous change did the test sample used for this set of tests make use of this antenna.)

5.7. Other Technical Changes

FCC 47 CFR 2.932, 2.1043 (c) applies. Refer to RFI Global Services Ltd. for details.

5.8. Changes to “Brand” name

The record of product grant approval is registered under the FCC id and not the product name. The product may (subject to the normal trademark etc constraints) be marketed under any name provided the product is electrically identical to the one on the grant with respect to those aspects under the grant. Product supplied as such must bear the original FCC id. For “Brand” name change products you should ensure that any new labels and user manuals still contain the information required within the appropriate regulations.

5.9. Changes to FCC “id”

Should you wish to supply the identical product but change the FCC id refer to the document “RFI Global Services Ltd TCB form 731 Instructions” for guidance.

Where you need a new FCC id for reasons A, B or C then the following process should be followed;

A completed RFI Global Services Ltd TCB form 731, with section 14 marked appropriately.

An updated Label, updated photos (external), an updated User manual and a cover letter requesting a new FCC id, stating the original FCC id, the requested new FCC id, details of any permissive changes (both class 1 and class 2), and the details of the changes.

5.10. Changes to the company information

FCC 47 CFR 2.929 applies.

6. Certificates and Records

6.1. Certificates are issued in the name of the applicant company which is thereafter referred to as the holder. Certificates also include the address of the holder (or an alternate address where identified within the application), data necessary for identification of the product, the reference to the technical data presented to RFI and any conditions for its validity. RFI shall maintain records of all the details relating to a certificate evaluation for 10 years after the last issue of certificate. You are required to maintain a record of any complaints and the associated actions (including modifications, permissive change requests or additional testing etc.) relative to the certified product. These records shall be made available to RFI on request. RFI will forward complaints about certified products to the certificate holder within an appropriate period of time (less than 5 working days where possible).

7. Ongoing surveillance

7.1. The FCC requires RFI to undertake surveillance on products for which we have issued a grant. You are liable to the market surveillance process. Under this RFI may at certain intervals send you an enquiry requesting the a sample of the product for testing. When you sign the “RFI Global Services TCB form 731” or the “agency letter” you are agreeing to supply the sample. Failure to do so will be report to the FCC under there rules.

7.2. The surveillance is carried out by appointed RFI employees or by agencies acting on behalf of RFI. Surveillance activities are in accordance with ISO Guide 65 section 13 and or ISO 17025. The fees for surveillance are included in the fees for processing applications unless the product fails the surveillance test, in which case additional costs, for the associated testing, may be charged.

8. Impartiality Committee

8.1. The RFI Global Services Ltd TCB scheme is monitored by an “Impartiality Committee” as part of the accreditation process. Any comments on the scheme process can be forwarded to the committee via email at impartiality.committee@rfi-global.com for review.

Contact information:

RFI Global Services Ltd.
Pavilion A
Ashwood Park
Ashwood Way
Basingstoke

RG23 8BG

Email certification@rfi-global.com

Telephone +44 (0) 1256 312000