



# commonly asked questions

**about FCC Part 15 Registration**



# Commonly Asked Questions for FCC Part 15 Registration

## What types of approval does the Federal Communications Commission (FCC) recognize?



1. Verification
2. Certification
3. Declaration of Conformity

The FCC also recognized Type Acceptance and Notification but removed these approvals in late 1998 in order to streamline the approval process.

From CFR47, Subpart J, Equipment Authorization Procedures

## What are the differences between the three different approvals?

### What type of products does each pertain to?

#### Verification

Verification is the easiest approval to obtain. It is reserved for most unintentional radiators. An unintentional radiator is a device not specifically designed to radiate radio frequency (RF) energy; the RF energy is parasitic to the device's operation. Examples of products that only require verification are lasers, blenders, vacuum cleaners, etc.

Once a product has been verified as being compliant to the requirements of CFR47, a label attesting to this shall be affixed to the product and reproduced in the product literature. The manufacturer shall keep the test report on file for the life of the product. The report shall be surrendered to the FCC upon request.

From CFR47, Part 2.902, 10/1/98, 2.952 - 2.953

## Certification

Certified products have been reviewed and approved by the FCC's Office of Engineering and Technology (OET). It is reserved for all intentional radiators. An intentional radiator is a device designed for the generation and emission of RF energy. This includes things like walkie-talkies, garage door openers, etc.

These products must be tested at an FCC-listed facility. If the test facilities have not been reviewed by the OET, adequate information describing the facility (CFR 2.948) shall be submitted along with the test data. Detailed product information shall be transmitted with the report to the OET. After approval, the manufacturer has to affix the appropriate label to the product. One of the labels shall have the FCC ID code that can be used to check the approval of the product.

From CFR47, Part 2.907, 10/1/98

## Declaration of Conformity



From CFR47, Part 15.19, 10/1/98

Declaration of Conformity is used primarily for computing equipment. The manufacturer/importer or their representative tests the product, determines compliance, and issues a statement declaring the product's compliance. It is intended as an alternative to Certification. Testing can be done only at an ISO Guide 25 accredited (either NVLAP or A2LA) laboratory. Any laboratory that has applied for ISO Guide 25 evaluation may issue DoCs. DoC can be applied to personal computer equipment and peripherals (Class B). It also applies to CB receivers, super-regenerative receivers, Part 15 receivers, TV interface devices, cable system terminal devices and consumer ISM equipment.

DoC-type equipment can also be approved by certification. The advantage of DoC is that the FCC is taken out of the approval process. This speeds up time to market tremendously.



**EMC Automation is NVLAP approved and authorized to issue Declarations of Conformity. (NVLAP Lab Code 200430-0)**

From CFR47, Part 2.906, 10/1/98  
CFR47, Part 2.948, 10/1/98

This table is a summary of what has been discussed:

Type of Approval	Devices	Contact with FCC Required?
Verification	Class A (business) computer equipment, TV and FM receivers, non-consumer industrial, scientific, medical equipment	No
Certification	Personal computing equipment and peripherals, VCRs, cordless tele-phones, garage door openers, scanning and super-regenerative receivers, AM, FM and TV transmitters, point-to-point microwave transmitters, certain microwave auxiliary broadcast receivers and other receivers, radio equipment in licensed radio service such as cellular phone equipment, land mobile transmitters, police/fire transmitters, citizen's band radios, etc.	Yes
Declaration of Conformity	Personal computer equipment and peripherals (Class B), CB receivers, super-regenerative receivers, Part 15 receivers, TV interface devices, cable system terminal devices and consumer ISM equipment	No

## How long does it take to get FCC approval?

An electronically filed application can be approved in 30-90 days. The FCC no longer accepts mailed applications for FCC Form 731.

## What can be done to speed up the FCC Certification process?

The only thing that can be done is filing **electronically** as completely, thoroughly, and as quickly as possible. The FCC processes applications on a first-come, first-served basis.



## Why does the approval process take so long?

The OET examiners handle a tremendous number of applications. Electronic filing has done a lot to improve response time but there is still a tremendous amount of reports that need to be reviewed.

## What else is the FCC doing to improve the approval process to cut down the time to market?

The Federal Communications Commission is in the process of getting out of direct involvement in the approval process. The tasks of reviewing and approving test files will be given to private entities called Telecommunication Certification Bodies (TCB). TCBs are ISO Guide 25 approved organizations approved by NIST. TCBs would be roughly equivalent to European Union Competent Bodies. A manufacturer would send their data to a TCB instead of the FCC. After review of the data, the TCB would determine compliance.

The FCC will focus on its core functions of creating, maintaining and enforcing U.S. telecommunications regulations. The plan and timetable for this transition are under development.

From Report No. GN 98-B, 12/17/98; FCC 98-338, 12/23/98

## **What is necessary for a filing once testing is complete?**

The following is necessary for a successful filing:

- 1) The test report.
- 2) Photographs of the product both assembled and disassembled.
- 3) Photographs of the product under test.
- 4) Parts List for the product.
- 5) Assembly drawings for the product.
- 6) A description of the location and the wording of the FCC ID label.
- 7) Sample brochures for the product.
- 8) A functional block diagram for the product.
- 9) Operational description of the product.

From <https://gullfoss.fcc.gov/prod/oet/forms>

## **How is a test facility listed by the FCC?**

Listing a facility with the FCC is a straight-forward process. The details are in Section 2.948 of CFR47. A package consisting of site attenuation data, 8" x 10" photographs and a dimensioned drawing showing the relationship of the test facilities and its surroundings, an equipment list, etc., is submitted to the FCC's Office of Engineering and Technology (OET) for

review. Upon approval, your company is listed on the FCC's website.

Listing is not an endorsement by the FCC. It cannot be used for advertising like NVLAP or A2LA approvals.

From CFR47, Part 2.948

## **Can a foreign facility be listed by the FCC?**

A foreign lab can be listed by the FCC. They simply have to submit the same required documentation as their U.S. counterpart.

A foreign FCC-listed laboratory can do most things their U.S. counterparts can do, providing they follow the required standards and guidelines. All documentation must be in English. Special banking arrangements may have to be made since the FCC requires payment in dollars drawn from a U.S. bank. NVLAP will certify a foreign lab if there is no Mutual Recognition Agreement (MRA) between the U.S. and the foreign accreditation body. Parts 15 and 18 verification testing (which does not involve FCC submittal) can be done easily by a foreign lab.

In testing involving submittal, a foreign lab would have some difficulty in discussing issues with the FCC. Successful problem resolution would be hampered by time differences, language difficulties, etc. In this case, a foreign-based corporation would be served best by a U.S. based lab experienced with FCC regulations, procedures and negotiations.

From Report No. GN 98-13, 12/17/98; FCC 98-338, 12/23/98

## **What do you know about MRA?**

MRA stands for "Mutual Recognition Agreement". It is a reciprocity agreement between the U.S. and a

foreign government. As far as compliance is concerned, there has to be an MRA with a foreign government making NVLAP, A2LA accredited laboratory data acceptable to that country's laboratory accreditation body(s).

From Report No. GN 98-13, 12/17/98; FCC 98-338, 12/23/98

## **Any Do's or Don'ts in applying FCC listing? Are there stories about a site that did everything wrong?**

Research your problem carefully before calling the FCC. A well thought-out question can do a lot towards establishing credibility. The engineers have other duties in addition to answering questions. Their time is precious and they are appreciative of anyone who understands this.

## **What parts or EUTs can a European FCC-listed lab do?**

A foreign FCC-listed laboratory can do most things their U.S. counterparts can do, providing they follow the required standards and guidelines. All documentation must be in English. Special banking arrangements may have to be made since the FCC requires payment in dollars drawn from a US bank. NVLAP will certify a foreign lab if there is no MRA between the U.S. and the foreign accreditation body. Parts 15 and 18 verification testing (which do not involve FCC submittal) can be done easily by a foreign lab.

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a U.S. based lab experienced with FCC regulations, procedures and negotiations.

From FCC 98-338, 12/23/98



## What is a Grantee Code? How is one obtained?

A Grantee Code is three alphanumeric characters that uniquely identify your organization (company, division, etc.) to the FCC. The FCC ID of any FCC-certified device begins with the Grantee Code. A company should apply for a Grantee Code only if the company is ready to file Form 731 for the *first* time. The most direct way of obtaining a Grantee Code is by electronic filing:

<https://gulfoss.fcc.gov/prod/oet/index.html>

You only apply for a Grantee Code once. The Grantee Code is yours for as long as there's an FCC.

From CFR47, Part 2.905, 10/1/98

## What is an FCC Identifier?

Products approved by the FCC require a unique seventeen (17) alphanumeric code. The first three characters are the Grantee Code issued by the FCC. The next fourteen (14) characters are picked by the applicant company at the time of Form 731 filing.

From CFR47, Part 2.905, 10/1/98

## What is Form 731?

When a company intends to file a new product with the FCC, the applicant files an application called Form 731



with the Commission.

It identifies the applicant, contacts, the product, etc. Electronically filing this form automatically leads to Form 159.

Form 159 is the remittance fee form that needs to be sent with any payment check. It is due immediately upon application.

## How are copies of the FCC rules obtained?



Official copies of the Code of Federal Regulations are available from the Government Printing Office. The website is:

**<http://www.access.gpo.gov/nara/cfr/index.html>**.

The OET is responsible for CFR47 and its contents. An unofficial version of CFR47's parts are available at:

**<http://www.fcc.gov/oet/info/rules/>**.

For more information regarding FCC Part 15 registration contact:

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