August 10, 2017

**Federal Communications Commission** 

OMB Control Number 3060-0329

**Explanation of Non-Substantive Changes to OMB Control Number: 3060-0329:** 

**Purpose of this Submission:** The Commission is seeking a non-substantive change request for this information collection. On July 14, 2017, the Federal Communications Commission (Commission or FCC) adopted "Amendment of Parts 0, 1, 2, 15 and 18 of the Commission's Rules regarding Authorization of Radiofrequency Equipment" *First Report and Order* (1<sup>st</sup> R&O) in ET Docket No. 15-170, FCC 17-93. This proceeding adopted a new procedure for equipment authorization—Supplier's Declaration of Conformity (SDoC)—that permits self-approval by the responsible party. SDoC combines the elements of two existing self-approval procedures for equipment authorization—verification and Declaration of Conformity (DoC). The Verification and DOC procedures will no longer be available after a transition period, and the use of a single self-approval procedure (SDoC) will simplify the authorization protocol for eligible devices under the Commission's rules.

The Commission will permit parties to self-approve equipment under any of the three procedures during a one-year transition period which commences when the rules adopted in the Report and Order become effective. Specifically, during the transition period, devices now subject to verification could be self-approved instead under the new SDoC procedure, and devices now subject to DoC also could be self-approved under the new SDoC procedure (**rule section 2.950(i)**).

The SDoC procedure differs from the verification procedure in the following ways. First, SDoC will require the responsible party to provide a compliance statement with the device under that procedure's record retention rule (rule section 2.938(b)(11)), which is required for some but not all products under the verification procedure. The other elements of the SDoC record retention requirements are the same as those for the verification procedure. Second, devices approved under SDoC may include the FCC logo on a voluntary basis (rule section 2.1074(b)), which they are not permitted to do so under the verification procedure. Third, parties assembling devices from modular components which are themselves subject to SDoC approval can rely on the compliance statements for each component, whereas under verification they would have to separately test the new device for compliance (rule section 2.1077(b)). Thus, fewer compliance tests will be conducted under SDoC than under verification, and the record retention requirement for compliance tests remains the same. All of these SDoC collection requirements are already covered by Control Number 3060-0636 (DoC), for which the Commission is requesting non-substantive revisions.

Information collection for the verification procedure's record retention requirements is approved under Control Number 3060-0329; there are no changes for parties who choose to self-approve their devices under the verification procedure during the transition period. Information collection for SDoC is covered by the non-substantive revisions to Control Number 3060-0636. The two approved collections taken together will not result in an increase in the number of respondents and responses (the total number of respondents should remain the same) nor in the total burden hours by permitting parties to choose either the verification or SDoC self-approval procedures during the transition period.