



## The FCC Part 68 Streamlining Order and What it Means to Suppliers of Wire-line Telecom Terminal Equipment

On January 24, 2001, the Federal Register published FCC Report & Order FCC 00-400, CC Docket 99-216. This Order allows two options to demonstrate compliance with telephone network protection criteria, either by the use of the Telecommunication Certification Body (TCB) certification program or the Supplier's Declaration of Conformity (SDOC).

The TCB program has been in place since June 2000. This program provides suppliers with an FCC certification, granted by a TCB, without the usual delays encountered when submitting applications to the FCC.

The SDOC program will become operational after the publication of Technical Criteria standards and the establishment of a terminal equipment database by the Administrative Council for Terminal Attachment (ACTA). ACTA is a private entity, established in accordance with the provisions of CC Docket 99-216, and composed of members elected by various interest segments. ACTA is scheduled to have its inaugural meeting on May 2, 2001, in Bethesda, MD. Additional information regarding the meeting may be directed to Megan Hayes, ACTA Secretariat *pro tem*, [acta@atis.org](mailto:acta@atis.org).

ACTA has established a web presence at [www.part68.org](http://www.part68.org). The FCC has provided ACTA with several links to Part 68 related documents and rulemakings indicating the start of the transfer of responsibilities from the FCC to industry. The election for members to populate the Council has been completed. Two industry segments, the Terminal Equipment Manufacturer (TEM) and Other Interested Parties (OIP) have tied votes, so a run-off election is being scheduled to resolve ties. CCL staff has been elected to be a primary voting member on the Council as part of the Laboratories (LAB) interest segment.

***Either option of demonstrating compliance of terminal equipment must be supported by compliant test data.*** The test data must be obtained by testing the equipment to the Technical Criteria as developed by ACTA. The first issue of the Technical Criteria Standard published by ACTA is required by the FCC to be identical to the criteria as found in 47 CFR Part 68, October 2000 issue.

### **What this means to suppliers of terminal equipment is the following:**

1. Terminal Equipment must continue to comply with the technical criteria of
  - a. Environmental conditioning requirements (section 68.302, 47 CFR Part 68, October 2000 issue)
  - b. Leakage current limitations (section 68.304, 47 CFR Part 68, October 2000 issue)
  - c. Hazardous voltage limitations (section 68.306, 47 CFR Part 68, October 2000 issue)
  - d. Signal power limitations (section 68.308, 47 CFR Part 68, October 2000 issue)
  - e. Transverse balance limitations (section 68.310, 47 CFR Part 68, October 2000 issue)
  - f. On-hook impedance limitations (section 68.312, 47 CFR Part 68, October 2000 issue)
  - g. Billing protection limitations (section 68.314, 47 CFR Part 68, October 2000 issue)

- h. Hearing-aid compatibility magnetic field and Volume Control requirements (sections 68.316 and 68.317, 47 CFR Part 68, as published in the Federal Register, January 24, 2001), if applicable
- i. Consumer protection requirements (section 68.318, 47 CFR Part 68, as published in the Federal Register, January 24, 2001), if applicable.

**Note: The criteria of 47 CFR Part 68, October 2000 issue, Sections 68.302 through 68.314, will be published in ANSI TIA/EIA 968, *Telecommunications Telephone Terminal Equipment, Technical Requirements for Connection of Terminal Equipment to the Telephone Network*. The Equipment Labeling requirements will be published as TIA/EIA TSB-198, *Telecommunications, Telephone Terminal Equipment, Labeling Requirements*. The technical requirements used currently by the FCC in granting waivers to Stutter Dial Tone equipment and ADSL equipment will be published as TIA/EIA-IS-883, *Telecommunications Telephone Terminal Equipment Supplemental Criteria for Stutter Dial Tone Detection Devices and ADSL Modems to Prevent Harm to the Telephone Network*.**

2. After the equipment is found compliant with the Technical Criteria, the test data can be used by the supplier to either:
  - a. Submit to a Telecommunication Certification Body (TCB) to obtain an FCC Part 68 Certification Number. This process basically allows the maintenance of the “status quo” for suppliers to whom an FCC Grant continues to bring a competitive marketing advantage.

or

  - b. Create a Declaration of Compliance, in accordance with the recommendations of ISO Guide 22.
3. In some cases, the supplier may choose to do both a) and b) above, based on the same set of test data. Multi-national suppliers have found that some countries prefer to have an FCC Part 68 grant over the Supplier’s own Declaration of Conformity.

**Communication Certification Laboratory (CCL)** is a TCB, accredited by the American National Standards Institute (ANSI) to ISO Guide 65, and designated by the FCC to provide FCC Part 68 certification grants as well as grants for Unlicensed and Licensed Transmitters under the various FCC Rule Parts as allowed under FCC GEN Docket 98-68. CCL is also a testing facility accredited to ISO Guide 25 by the National Voluntary Laboratory Accreditation Program (NVLAP) of the Department of Commerce’s National Institute of Standards and Technology (NIST).

CCL will test your terminal equipment and either:

- Provide you with an FCC Part 68 Certification Grant, or
- Prepare on your behalf an SDOC statement, *based on the same set of test results*.

Either option can be tailored in accordance with your market entry schedule. CCL has extensive Part 68 testing and certification experience and has been involved in Part 68 testing and certification since the program’s inception. CCL staff is actively involved in the development and formulation of the technical criteria for terminal equipment as well as in ACTA’s activities.

CCL will work with you to accommodate even the tightest schedule. Contact Joe Jackson [jwj@cclab.com](mailto:jwj@cclab.com) 801-972-6146 x 1220, or Rich Winter [rlw@cclab.com](mailto:rlw@cclab.com) 801-972-6146 x 1218 for details.