

## ADMINISTRATIVE COUNCIL FOR TERMINAL ATTACHMENTS (ACTA)

MEETING DATE: December 9, 2004

TITLE: Proposed revision to incorporate a slight addition to the Guidelines & Procedures for submittal of information to ACTA For inclusion in the database of approved Telephone Terminal Equipment ("TTE") – Revision 2.5 – July 2003

SOURCE\*: Jim Haynes - Uniden

PURPOSE: Amendment to Guidelines & Procedures (Revision 2.5)

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### ABSTRACT

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During the recent ACTA Educational Conference held at the Hamilton Crowne Plaza Hotel in Washington, DC on August 5 – 6, 2004, more precisely during "Terminal Reporting Requirements" held during the morning of the 2<sup>nd</sup> day, I raised a point of potential misunderstanding and controversy due to a conflict in wording in a **Notice of Change ("Notice") Filing** as defined in Appendix A, Item 14: Filing Status on page 22 of the above referenced document.

This contribution proposes the additional wording that should clarify the labeling requirements as mandated in the TIA's TSB-168-A dated August 2003. Please note that an additional contribution to TIA's Engineering Committee TR-41.9 will be submitted with a proposal that a similar addition to the wording in the TSB-168-A would also aid in clarification and hopefully prevent a potential misunderstanding of the labeling requirements and procedures.

As a point of reference and understanding, it should be known that applications made utilizing a **Notice of Change Filing** are used many times for new terminal equipment where the exact telephone interface circuitry and other features are carried over to the new telephone product. The second sentence under the heading "**Notice of Change ("Notice") Filing**" on page 22 of the "**Guidelines & Procedures**" document states, "A notice filing is required, for example, when a trade name or model number is added to a previously approved device or system. Typically, such additions describe cosmetic variations, or are for marketing the product under a different trade name or model name."

The key point for a potential misunderstanding is that such a **Notice of Change Filing** could be considered a new application; therefore, resulting in a new equipment approval as mandated in TIA/TSB-168-A.

Referring to Annex A – Equipment Classifications in TIA/TSB-168-A under section **A.1.1. New Approvals**, it states, “New equipment approvals shall use the equipment codes in Annex A”.

As expressed during the aforementioned ACTA Educational Conference, the above requirement for new equipment approvals does not accurately reflect the intentions of TSB-168-A. An example of a potential misunderstanding would be a cordless telephone that was originally approved using the “WI” equipment code to signify the ISM Band utilizing spread-spectrum technology. If a new model that uses the exact telephone interface circuitry and radio frequency circuitry, and has the same electrical and acoustic properties as the originally approved model is being submitted under a **Notice of Change Filing**, under strict interpretation of the current guidelines, it could not continue to be labeled or use the previously issued Certification (or Registration) Number because of the fact that it is by general definition, a new model and a new application.

According to the consensus of respondents during the ACTA Educational Conference, it was agreed that the new approval, based upon a previously approved model that was applied using a **Notice of Change Filing** should continue to use the originally issued Certification (or Registration) Number that was previously used and approved by the Commission or ACTA. In other words, the use of a Certification (or Registration) Number would be indefinite so long as the application was made using a **Notice of Change Filing**. For example, if a telephone device was approved using a Certification (or Registration) Number in the format **AAABBB-NNNN-XX-Y** as illustrated in the **"Guidelines & Procedures"** document on page 19, **Item 3: Product Identifier**, second paragraph; the applicant may continue to display this same Certification (or Registration) Number when filing under the provisions of a **Notice of Change Filing**.

Therefore, I propose the additional wording at **Appendix A, Definition of Terminal Equipment Detail Items: Item 14: Filing Status** at the end of the paragraph with the heading, **Notice of Change (“Notice”) Filing**, a new sentence as follows:

**“Certification (or Registration) Numbers assigned to a terminal device when the Original filing was approved, must be used indefinitely when applications are made using a Notice of Change Filing that references an Original filing.”**

Thank you for your consideration in this matter.

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