

**Federal Communications Commission
Office of Engineering and Technology
Laboratory Division**

June 22 , 2023

SCHEDULED FEEDBACK DATE FOR MULTIPLE PAG

1 INTRODUCTION

This document describes how TCBs can request an FCC-scheduled feedback date for the review of certain Multiple PAG (MPAG)¹ applications. This is intended to improve the efficiency of FCC reviews of complex MPAGs through a better allocation of resources.

The process is designed for complex filings from applicants for a grant of certification (typically manufacturers, hereafter referred to as “Applicants”) with a months-ahead product development schedule; for this reason, as discussed below, the MPAGs need to meet a minimum threshold level of complexity to be considered for this process.

Applicants will contact a TCB for certifying a device, with a well-defined schedule and design information so that the TCB can assess what MPAGs will be required. Then the TCB submits a Knowledge Data Base (KDB) Inquiry to request an FCC-scheduled response date for the MPAG review. The same inquiry is then used to manage all the correspondence that follows related to that MPAG.

The scheduled review date is set by the FCC, based on workload, and on a first-come, first-served basis. Only MPAGs that meet specific criteria (specified below) are eligible for this process.

The FCC’s response providing the scheduled date for the feedback on the MPAG review must not be considered as an approval date, since there is no guaranteed approval for any PAG.

The actual approval date will depend on the MPAG complexity, and on how well the compliance requirements are demonstrated. In some cases, the MPAG feedback consists of an approval, in other cases the approval may come only after further information is provided. Provisions are set for feedback date re-scheduling if further review iterations are needed, e.g., when the FCC requests additional information.

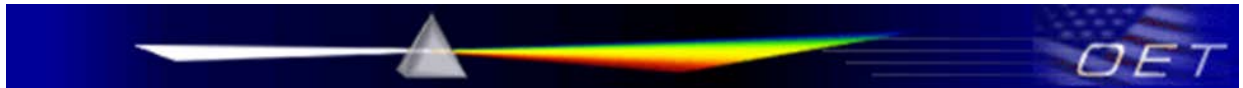
2 QUALIFYING REQUIREMENTS FOR MPAG FEEDBACK SCHEDULING

The MPAG considered for requests of scheduling of MPAG review feedback date must meet the following set of criteria:

- *MPAG minimum size threshold.* The MPAG shall include at least four PAG items to avoid overloading the system with many small MPAGs.
- *Timeline.* The TCB shall provide an estimated “MPAG ready” date for the MPAG application to be considered ready for review. This date shall be no sooner than two calendar months after the submittal of the KDB inquiry with the TCB initial request (the KDB inquiry submittal record serves as a reference).

By this “MPAG ready” date, the TCB shall have submitted all the MPAG applications into

¹ This process is limited to multiple PAGs and not applicable to a single PAG.



EAS with the required test data exhibits, and the MPAG KDB Inquiry shall include the application “TC” numbers and the MPAG summary table.

The minimum time interval between a TCB’s request date for MPAG feedback scheduling and the “MPAG ready” date is two calendar months. For instance, if a TCB submits a request on February 3rd, the estimated “MPAG ready” date cannot be before April 4th.

As needed, the TCB may also request at any time, in the same MPAG KDB inquiry, an extension of the “MPAG ready” date, for instance, when the test labs or the TCB needs additional time to review the data consistency before submittal. As needed then, the FCC may change the scheduled review feedback date accordingly.

The FCC will not schedule the feedback date before the “MPAG ready” date. This requirement may lead TCBs to opt for the “standard” process in some cases, while making this approach more suitable for longer-term project schedules.

- *Referenced FCC IDs.* The MPAG KDB inquiry may refer to more than one FCC ID, but only for approved variants of the same reference model, and for data referencing, following the procedure of KDB Publication 484596-D01 (see examples below). In some cases, if the number of devices in the MPAG leads to excessive complexity, the FCC may also request to split the MPAG in order to reach a more manageable size.
- *MPAG Summary.* Scheduling requests shall include preliminary information on the MPAG sufficient for the FCC to estimate the effort required for the review, and then schedule the feedback date accordingly. This information shall include an outline of the device features (plus, if applicable, related approved variants under the same MPAG) and a preliminary MPAG summary table showing which PAG items will be considered for each device/variant. Requests will only be considered if complete.

Example 1 – Scheduling MPAG Reviews for Two Models of the Same Device

A manufacturer is planning for the certification of a new device that consists of two models (“A” and “B,” each with different FCC IDs) to be thoroughly tested separately.

The TCB receives the manufacturer’s preliminary documentation, reviews it, and identifies the required PAGs to qualify for the MPAG feedback date scheduling.

The TCB reports that model “A” has four separate PAG items, while model “B” requires two PAGs. The two models are thoroughly tested separately, with no data referencing. Thus, grouping all six PAGs for both models into a single MPAG with a scheduled feedback date is not allowed.

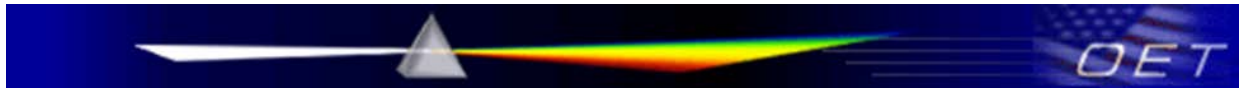
The TCB then informs the manufacturer that only model “A” qualifies for the MPAG feedback date scheduling (because the minimum required number of PAGs per MPAG is four). A separate, standard MPAG with two PAG items will be required for model “B.”

Example 2 - Scheduling MPAG Feedback Date with Approved Variant Data Referencing

A manufacturer plans a new device certification consisting of two models, a reference and a variant, each with different FCC IDs and a KDB-accepted data referencing plan for the variant (per KDB Publication 484596). A single MPAG KDB Inquiry is being filed to include the reference and the variant.

The TCB receives the manufacturer’s preliminary documentation, reviews it, and identifies the required PAGs to qualify for the MPAG feedback date scheduling.

The TCB reports that model “A” has three separate PAG items, while model “B” requires only one



PAG: the combined MPAG package with both models qualifies for feedback date scheduling process (based on the number of PAGs).

Then the TCB proceeds by submitting a KDB Inquiry with a request a feedback date along with all the preliminary information about the devices and the applicable PAG items.

3 MPAG FEEDBACK SCHEDULING PROCESS WORKFLOW

In summary, the process consists of three main steps (and is summarized in Figure 1):

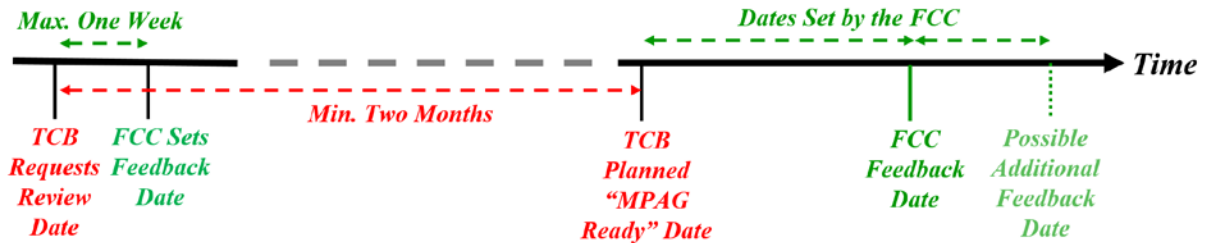


Figure 1 – Overview of the MPAG feedback scheduling process

1) TCB requests scheduling of a feedback date for the MPAG review

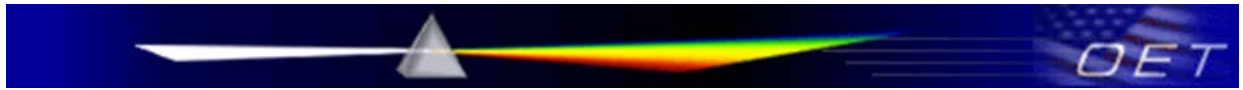
- After receiving all the required information from the Applicant (typically a manufacturer), the TCB thoroughly reviews the exhibits for readiness (completeness, correctness, properly following PAG checklists, and provides a detailed MPAG Summary Table).
- If all the required information is in place to support FCC compliance, the TCB submits a KDB inquiry requesting an MPAG feedback date. The KDB Inquiry with scheduling request shall meet all the criteria listed in Section 2., providing information on the number of devices (number of FCC IDs), number of applicable PAG items, and date of expected upload of all applications (the “MPAG ready” date).
- The FCC is committed to responding to the TCB inquiry within one calendar week by providing a date for the expected feedback on the MPAG review.

2) TCB Completes the MPAG Applications

- Upon receiving compliance test data, the TCB reviews the exhibits for readiness and files the EAS applications on or before the “MPAG ready” date stated in the original KDB Inquiry.
- During the exhibit review process the TCB may ask for an extension of the “MPAG ready” through the same KDB Inquiry, for instance when more time is required for a thorough review and/or to provide the properly structured exhibits with demonstration of compliance.

3) FCC provides feedback on the MPAG review

- The FCC makes its best effort to meet the scheduled date, but this schedule is not to be considered binding, as in some circumstances, delays may occur.
- Any expected FCC delay will be communicated as soon as possible.
- The review feedback is not an assurance for approvals: questions, requests, or denials are also possible.
- On the scheduled date for feedback, the FCC responds with either approval for the MPAG, or with a request for additional information, along with a new scheduled feedback date (to



account for the time required to collect the additional information).

- If the MPAG is not approved, requests for additional information will come with a new scheduled date for the additional feedback (e.g., factoring in the need for additional lab. time, as needed). After the TCB addresses the requested information, on the new scheduled date the FCC may approve the MPAG for grant processing.
- At FCC discretion, repeated review iterations due to incorrect/insufficient information may result in no further date scheduling, thus reverting the MPAG to the standard review process.

CHANGE NOTICE

06/22/2023: 388624 D03 v01 original document.