



## Implementing the Supplier's Declaration of Conformity (SDoC)

Under the FCC's Rules, equipment that contains digital circuitry and receivers that tune between 30 MHz and 960 MHz, including the receiver portions of transceivers, must comply with the emissions limitations of FCC Part 15B. These limits are for **unintentional** emissions from electronic devices, such as from microprocessors and digital equipment, opposed to **intentional** transmitters, like WiFi, Bluetooth and other radio devices.

The new Rules merge two previous compliance processes called *Verification* and *Declaration of Conformity*. A single process now exists called *Supplier's Declaration of Conformity* or "SDoC."

Combined equipment (unintentional and intentional emitters) must comply with Certification and/or SDoC as specified for the type of device by the rules (15.101 for unintentional radiators, or the specific rule parts for other TX or devices falling under licensed rule parts). Note that certain types of devices may allow either process to be applied, but certain types of devices may only allow for Certification. Complex device may fall under several types of equipment and should apply all that are applicable. Mobile phones, WiFi, WLAN, notebook computers and tablet computers are a combination of radio transmitters that require certification and unintentional digital circuitry requiring use of the SDoC procedure.

The SDoC approval process is now used for both Class A and Class B equipment. Previously, Verification was required for Class A devices; DoC or Certification were required for Class B equipment.

To comply with SDoC requirements, a manufacturer must perform the necessary tests for unintentional emissions and document the results in a test report. However, the testing can be performed at any capable laboratory; it is not necessary to have *accreditation* at the laboratory.

### Labeling

The FCC warning statement must still be on the label or provided with literature provided to the consumer.

The FCC LOGO is now VOLUNTARY.





## Certification is still allowed

Devices subject to SDoC have the option to have the device **certified**. In such cases, all rules for certification will apply to that device.

## Information to the User

All SDoC devices require that a compliance statement be included with the product literature that identifies for consumers who is responsible for the device's compliance with the Commission's technical regulations. **That party must be located in the United States.** This is an important change; the party in the US would be responsible for communications regarding compliance of the device with the FCC Rules. In the previous Rules, the responsible person was not **required** to be named. One resource for this service is through our sister organization here: <http://violetteengineering.com/vec-sdoc-services/>

Compliance information may be in an electronic form, if the device contains a screen and the information can be accessible in no more than "three steps."

Example of Three Step Process:

STEP ONE: Turn on device

STEP TWO: Access a submenu of legal information

STEP THREE Access further submenu of FCC Compliance Information

For further details, the full FCC Text is here:

<https://www.fcc.gov/general/equipment-authorization-procedures>

A full set of guidance from the FCC is found in KDB:

<https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?switch=P&id=203240>

## Q&A

1) I have a previously authorized device before the new rule changes for sDoC became required in early November, 2018. Is there anything I need to do to continue to sell this previously authorized device?

We would recommend reviewing the FCC's Q&A found in KDB 896810:

<https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?switch=P&id=203240>

which has good information regarding the FCC's perspective of grandfathering.

2) I've made changes to my previously authorized device and am unsure which authorization to now apply. What should I do?



Due to nuances that may affect labeling, user's manual and responsible party obligations (which must be within the U.S. and may not have been applied originally) this is a good discussion for you to have with your test lab. Your test lab should be able to provide guidance depending your specific concerns.

3) I have a device that was previously a Class A device that was verified under FCC rules. I would like to now put our name on the device. Can we now do a change of ID?

A change of ID can only be done to a device previously certified, as the process involves giving a device a new FCC ID based on the previous FCC ID that was certified. It sounds like you would like to now certify the new device that was previously verified and give it an FCC ID which it did not previously have). To do so may likely require you to obtain new test reports (as the lab qualifications for verification are different than the requirements for a lab doing certification). If a sDoC is allowed for the type of device (see 15.101).

4) I previously verified my device, but now I understand the SDoC applies. I do not have a representative in the United States. What options do I have?

We suggest that you locate a distributor or importer for your product and make an agreement that allows them to act on your behalf. Alternatively, it is possible to Certify the device, which would have to be through your TCB.

For further information regarding SDoC, contact your ACB representative or send a message to <https://acbcert.com/contact>.

[ACBcert.com](https://acbcert.com)

American Certification Body, Inc. (ACB)  
6731 Whittier Avenue | Suite C110 | McLean, VA 22101