

**ADMINISTRATIVE COUNCIL FOR TERMINAL ATTACHMENTS (ACTA)**

MEETING DATE: February 28, 2002

TITLE: Proposal to simplify "Filing Status" in the ACTA Guidelines and Procedures

SOURCE\*: TIA Subcommittee TR41.11

PURPOSE: Decision

DISTRIBUTION TO: ACTA

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**ABSTRACT**

TIA TR41 subcommittee, TR41.11 "Administrative Regulatory Considerations" requests that the ACTA make a change to its "Guidelines & Procedures for submittal of information to ACTA for inclusion in the database of approved Telephone Terminal Equipment ("TTE")," Revision 1.1, dated October 2001 to simplify the filing process. This proposal simplifies the options for Type of Filing on the ACTA submission form by Replacing "Modification", "Notice" and "Re-certification/Re-approval" filings with the simpler "Change" filing.

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\* CONTACT: Greg Slingerland, Mitel Networks, Chair TR41.11



## COMMITTEE CORRESPONDENCE

February 22, 2002

Alliance for Telecommunications Industry Solutions (ATIS)  
1200 G Street, NW, Suite 500  
Washington, DC 20005 USA  
Attention: Mr. Tim Jefferies  
Director, ACTA and Technology Development

### Request to Simplify the ACTA Filing Process

TIA TR41 subcommittee, TR41.11 “Administrative Regulatory Considerations” requests that the ACTA make a change to its “Guidelines & Procedures for submittal of information to ACTA for inclusion in the database of approved Telephone Terminal Equipment (“TTE”),” Revision 1.1, dated October 2001 to simplify the filing process. These changes are shown in the attached document.

This proposal simplifies the options for Type of Filing on the ACTA submission form. Replacing “Modification”, “Notice” and “Re-certification/Re-approval” filings with the simpler “Change” filing is justified by the following rationale:

- The terms “Modification”, “Notice” and “Re-certification/Re-approval” were carried over from the old Part 68 Application Guide as part of the rapid implementation of the ACTA.
- Under today’s process we believe that “Modification”, “Notice” and “Re-certification/Re-approval” filings are all the same things. With the old FCC process, information included in the package sent to the FCC would be different for each of these filing types. Under the current process the information sent to the ACTA is the same regardless of origin of the change.

(This correspondence represents “working papers.” Therefore, contents cannot be viewed as reflecting the corporate policies or the views of the Telecommunications Industry Association or of any company. The Association, the companies and individuals involved, take no responsibility in the applications of this document.)

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- This simplification furthers the product approval process streamlining principle on which the ACTA was based.
- This change is in line with the FCC intent in CC Docket 99-216, Report and Order, FCC 00-400, paragraph 110 that states “we only require that the database contain sufficient information for providers of telecommunications, this Commission, and the U.S. Customs Service to carry out their functions.” We argue that these groups need to be aware of a change that affects the information however it is immaterial to their ability to carry out their function if the change was in the Modification or Notice category.

We anxiously await your decision on this matter.

Sincerely,

Greg Slingerland  
Chair, TIA TR41.11

CC: Mr. Steve Whitesell, Chair TR41  
Ms. Stephanie Montgomery, Senior Manager, Standards Development and Promotion, TIA

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In Appendix A, under item 14 replace the entire section with the words below:

Item 14: Filing Status - Enter the type of filing (i.e., “Original” or “Change”)

**Original Filing** - Original filings are required for equipment that has not been previously approved. Each original filing must be complete and without reference to a previously submitted application.

**Change Filing** – Change filings are required to report changes to approved equipment when these changes affect accuracy of the ACTA database information for that equipment. These changes may be technical or administrative. A change filing will be processed only when an original filing for the terminal equipment has been previously processed by ACTA or the FCC. Examples that may affect the ACTA database information include changes to the:

- Network address signaling code.
- Facility interface codes (FIC).
- Answer supervision codes.
- Ringer Equivalence Number (REN).
- Repetitive dialing features or status.
- Network address signaling code.
- Hearing aid compatibility.
- Network ports or USOC Jacks (adding or deleting).
- Any item that was reported in the ancillary equipment section of the prior filing(s).
- A trade name or model number added or changed (e.g., new model number or marketing the product under a different trade name or model number).
- Establishing a new classification for equipment (e.g., a change to a MF classification based on a previously approved KF system).
- A vendor who may want its own approval for marketing reasons (with permission of the original responsible party).

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Note: These changes above will also precipitate several editorial changes elsewhere in the Guidelines and procedures where there are references to “modification filings”, “notice filings” or “Re-certification/reapproval filings.” These will become “change filings.”

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