ADMINISTRATIVE COUNCIL FOR TERMINAL ATTACHMENTS (ACTA)

MEETING DATE: March 13, 2003

TITLE: Database Structure with Re-Certification Applications

SOURCE*: Mark Cassarino
ACTA Database Manager
mcassarino@atis.org

PURPOSE: Decision

DISTRIBUTION TO: Council Members, Sponsors, Secretariat

ABSTRACT

VTech has recently experienced a problem in adding new model numbers to an existing approval number after allowing a Re-Certification/Re-Approval filing by another Responsible Party who wished to have its own identification number. Discussions with database manager Mark Cassarino indicate submissions for re-certification for another party trigger changes that prevent additional filings against the old identification number. This implementation is consistent with one of the reasons listed in the Submission Guidelines document for doing a re-certification, but not for others. **Note: Parts of this contribution (e.g., *Background*) were taken from a "draft" contribution submitted to the ACTA Secretariat from Mr. Steve Whitesell.**

This contribution outlines the circumstances where an existing approval number should be maintained after allowing a Re-certification/Re-Approval; an illustration of the current database filing structure showing why it's structurally unfeasible to maintain an existing approval number and its multiple and unique product lines branching from Re-certifications/Re-approvals; and an illustration of the procedural change and its impact on the database. Necessary modifications to the Guidelines and Procedures document addressing the procedural change are provided in contribution ACTA-03-03-13-07A.

NOTICE

---

* CONTACT:

Background:

Appendix A of the "Guidelines & Procedures for submittal of information to ACTA for inclusion in the database of approved Telephone Terminal Equipment ("TTE")" (Submission Guidelines) provides instructions for each of the numbered items on the submittal form. The instructions for Item 14, Filing Status, read as follows concerning Re-certification/Re-approval filings:

> Re-certification/re-approval applications are required for limited cases requiring the processing of a new filing. They can include:
>
> (a) Changes in the network address signaling code (e.g., changing from a T to an E), for products using the historical FCC Registration Number format;
>
> (b) Establishing a new classification for equipment (e.g., a change to a MF classification based on a previously approved KF system);
>
> (c) Adding a new manufacturer; when manufacturing/distribution rights are transferred to another party;
>
> (d) When a vendor wants its own product identification number for marketing reasons (with permission of the original responsible party)
>
> (e) When changing from the FCC Reg. number format to the ACTA "US" number format.
>
> Note: Re-certification/Re-approval filings result in a new product identification number. Products using the historical FCC Reg. number will be required to change over to the ACTA "US" number.

Cases (a) and (b) are somewhat rare. They would be expected to result in a new approval number for the same responsible party (RP). While the RP could change all future products so that they conform to the new address signaling code or equipment classification, it is conceivable that the RP might wish to also continue making products using the old address signaling code or equipment classification. As a simple example, suppose the RP is making products that will either dial pulse or tone dial for vendor A (address signaling code E). Suppose the RP has the opportunity to sell a cost reduced version of the product that only provides tone dialing (address signaling code T) to Vendor B and, therefore does a re-approval filing to get a new approval number for this derivative product. Now suppose the RP has an additional opportunity to sell products of the original design to Vendor C under a different trade name and model number. The RP needs to be able to do a Notice Filing against the original approval number in order to do this.

Case (c) actually has two sub-cases. Adding a new manufacturer was a frequent use for re-certification filings in the past (before the FCC went to MUL listings). It was quite common to simultaneously submit an original filing and one or two recertification filings for alternate manufacturers because separate approval numbers were require for each manufacturer. That need has essentially disappeared under today's procedures where manufacturers can be added or changed without notification (the MUL concept). The second part of case (c) seems to be the most likely reason for wanting to prevent additional filings against the old approval number after a new number is obtained as a result of a re-certification/re-approval filing. If the manufacturing and distribution rights for a product are transferred to another party, then no further filings should be expected against the old approval number.

Case (d) is much like cases (a) and (b), except that it is much more likely to occur. An RP may get a product approved and then offer it for sale to Vendor A. If Vendor A does not wish to have the identity of its supplier listed in the database, it may choose to seek its own approval number and become a new RP (with the approval of the original RP). However, the original RP is not giving up its rights to the product, it is merely allowing Vendor A to become the RP for the products it sells. The original RP may then have the opportunity to sell the same product to Vendor B, who wants a similar arrangement. This requires the ability to make another re-certification/re-approval filing against the approval number issued to the original RP. Or the original RP may wish to now add a new model number under its own approval number for Vendor C, who is not concerned about the original RP being identified in the database. In either case, it is necessary for the original RP to be able to continue to make filings against its original approval number.

Case (e) is one in which the RP probably would not want to make additional filings against the old FCC approval number, but there is no fundamental reason why it should be prevented from doing so.

Current Database Structure:

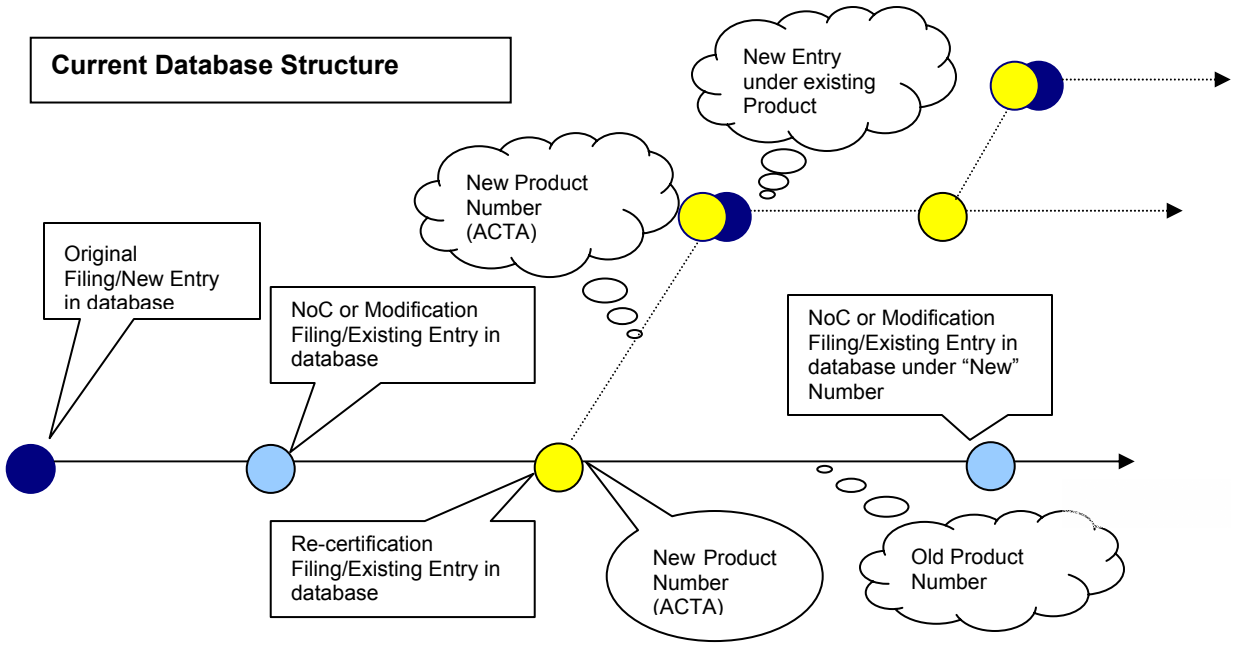
As was the database structure when maintained by the FCC, the ACTA database of approved products is structurally centered on identifying and tracking approved Part 68 products. To support this objective, other information such as the product's Responsible Party, Agent for Service, certification laboratory or filing Agent, peripheral attachments, and other relevant information is also maintained. This supporting information, however, while structurally associated/linked with the product, is maintained in separate "supporting" databases.

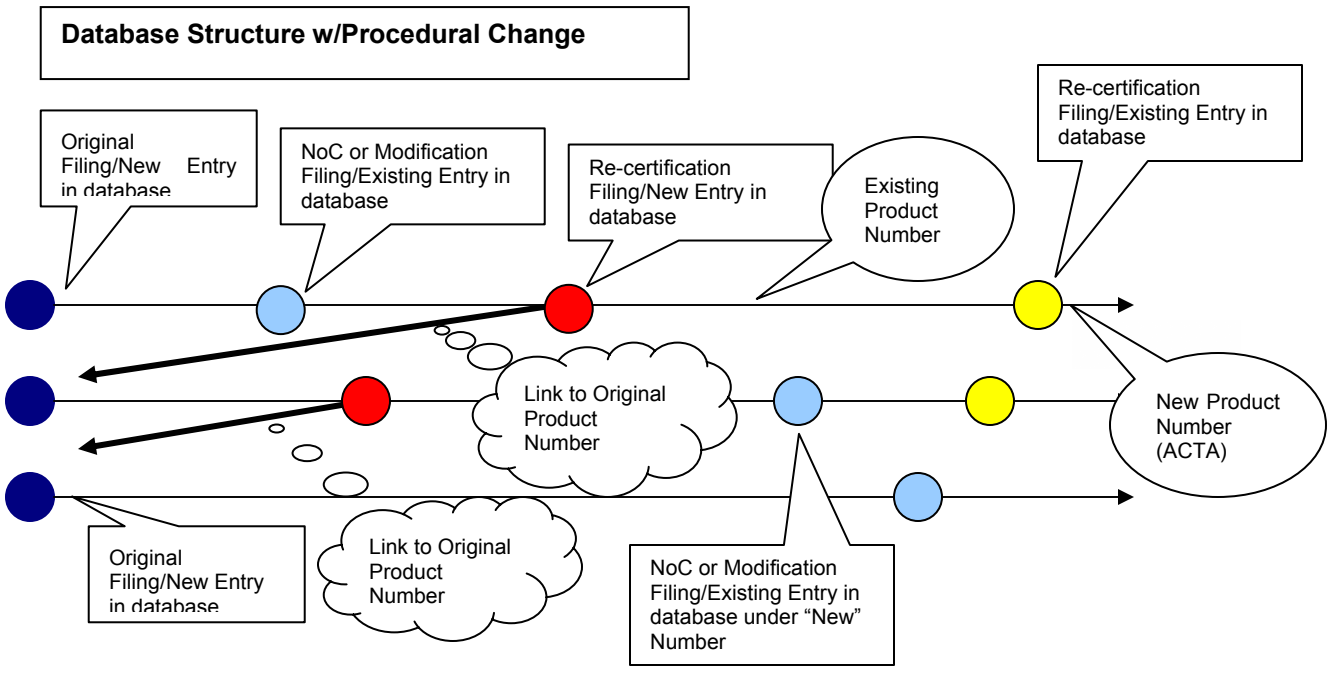
With the fundamentally database structure in mind (as outlined above), once a product is entered into the database (i.e., Original), it becomes its own separate and unique entity. As product changes occur over time (e.g., Modifications, Notices of Change, and/or Re-certification), the original or latest product information is copied to another [supporting] database, updated (i.e., trade/model names, modifications, etc.) and flagged, to allow the database to "track" the product. Consequently, once product information is copied and relevant data updated, it is nearly impossible (without special care from the Database Manager) to alter past information (i.e., a product's history) and maintain the same timeline and sequence of events that represent the present-product. In addition, it is structurally impossible for the database to "track" [potentially] an infinite number of products, or product-lines, branching off of a single database entry, as illustrated in the diagram "Current Database Structure."

Database Structure and Procedural Change:

Understanding the need to accommodate circumstances where [potentially] an infinite number of products, or product-lines, could branch off of a single product, as outlined under "Background," a procedural change to ACTA's submission guidelines and procedures is necessary.

As illustrated in the diagram "Database Structure w/Procedural Change," Re-certification/Re-approval filings that result in two or more product identification numbers (i.e., products), would effectively result in the new products becoming self-standing and physically entered separately into the ACTA database as an original filing, from a database perspective. From an administrative perspective, however, Responsible Parties would continue to follow the over-arching procedures specified for Re-certification/Re-approval filings. To this end, recommended changes to the ACTA Guidelines and Procedures are proposed in a separate, but related, contribution.


Current Database Structure
New Entry under existing Product
New Product Number (ACTA)
Original Filing/New Entry in database
NoC or Modification Filing/Existing Entry in database
NoC or Modification Filing/Existing Entry in database under "New" Number
Re-certification Filing/Existing Entry in database
New Product Number (ACTA)
Old Product Number


Database Structure w/Procedural Change
Original Filing/New Entry in database
NoC or Modification Filing/Existing Entry in database
Re-certification Filing/New Entry in database
Existing Product Number
Re-certification Filing/Existing Entry in database
Link to Original Product Number
New Product Number (ACTA)
Original Filing/New Entry in database
Link to Original Product Number
NoC or Modification Filing/Existing Entry in database under "New" Number