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*Via Electronic Filing*

April 11, 2025

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: *In Re: Delete, Delete, Delete* – GN Docket No. 25-133**

Dear Ms. Dortch:

The Consumer Technology Association (CTA) appreciates the opportunity to respond to the Federal Communications Commission’s (FCC or Commission) Public Notice on “identifying FCC rules for the purpose of alleviating unnecessary regulatory burdens.”<sup>1</sup>

CTA is North America’s largest technology trade association, representing over 1200 American companies. We also own and produce CES®, which convened tech leaders and over 4500 exhibiting companies in Las Vegas in January. Our members are the world’s leading innovators – from startups to global brands – helping support more than 18 million American jobs. As an American National Standards Institute (ANSI) accredited standards development organization, CTA has played a key role in advancing industry-driven solutions for over a century.<sup>2</sup>

CTA commends the Commission for undertaking a process to identify deregulatory initiatives focused on “deployment, expansion, competition, and technological innovation in communications.”<sup>3</sup> The Commission’s goal here aligns with [CTA’s 2025 Innovation Agenda](#), which outlines policy recommendations to support America’s vibrant innovation ecosystem. To achieve this shared goal, CTA recommends the FCC eliminate and/or streamline regulations on Equipment Authorization and Labeling.

### Equipment Authorization

The Commission's equipment authorization rules impose significant burdens on manufacturers, leading to increased costs and stifled innovation. These challenges include redundant and excessively lengthy compliance statements, unnecessary import conditions, superfluous warnings about device modifications, and overly burdensome recordkeeping and consumer

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<sup>1</sup> *In Re: Delete, Delete, Delete*, Public Notice, GN Docket No. 25-133 (rel. Mar. 12, 2025).

<sup>2</sup> See generally <https://www.cta.tech/Resources/Standards> (last accessed Apr. 10, 2025).

<sup>3</sup> Public Notice at pg. 2.

protection requirements. Modifying or removing these rules would lessen regulatory burdens and reduce costs for both users and industry.

#### *Knowledge Database Publications (KDBs)*

- When a new KDB is issued, it should include a grace period of at least 90 days before it is applied.

#### *Equipment Class Restrictions for Permissive Changes*

- The Commission should review and update guidance documents to remove antiquated restrictions inconsistent with current technological advancements. For example, the rules captured in [KDB 178919](#) prevent manufacturers from submitting a permissive change request for changes that would add or otherwise change an authorization's equipment class.
- These restrictions are not reflected in the Rules,<sup>4</sup> nor was there an opportunity for public comment. Thanks to advancements in technology, existing devices today can be updated with new and novel wireless technologies, breathing life into old devices, improving customer's lives, and reducing waste. The existing restrictions prohibit this type of permissive change based purely on the fact that a change in the equipment class is needed. This restriction is antiquated, does not reflect the current state of wireless technology, and has no bearing in ensuring that equipment complies with applicable rules.

#### *Test Standards*

- The FCC should harmonize testing methods and measurement standards<sup>5</sup> with other regions such as Japan, Europe, and Australia.

#### *Supplier's Declaration of Conformity*

- The Commission should expand use of Supplier's Declaration of Conformity (SDoC) and for commonly used wireless technologies such as Bluetooth, NFC, and Wi-Fi, replace certification with SDoC.

#### *Information Disclosure System*

- All information/documents submitted as part of the equipment authorization process should automatically be covered by Long Term Confidentiality (LTC) or Short Term Confidentiality (STC).
- The FCC should allow the STC cancellation date to be set up to ninety (90) days after a product is first sold to consumers

#### *Families of Products*

- The FCC should reduce testing and certification burdens for families of products under [KDB 484596](#).

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<sup>4</sup> 47 C.F.R. §§ 2.933 and 2.1043

<sup>5</sup> 47 C.F.R. § 2.947 (a)(3)

### *Pre-certification Importation Rules*

- The [12k quantity maximum](#) in the Rule<sup>6</sup> should be eliminated or significantly increased to at least 100k.
- The FCC should eliminate restrictions on the number of uncertified products that can be imported for pre-sale activity such as trade shows and allow pre-orders without restrictions or disclaimers.
- Products should be allowed to display the FCC ID before certification.
- The Commission should eliminate restrictions on the number of uncertified products that can clear customs and be used for development purposes.

### Labeling

The FCC should reduce labeling requirements and/or update language on labels to reflect modern technologies and use cases, including promoting broader adoption of QR Codes. By simply requiring one QR code per box, the Commission would reduce manufacturer burdens and consumer confusion by ensuring all relevant label information be available in one place in a format consumers are familiar with.

### Conclusion

To ensure America's continued leadership in technology innovation, the Commission should eliminate the rules discussed above. CTA also encourages the FCC to exercise caution in enacting new regulations that could increase regulatory uncertainty and costly manufacturing burdens on industry and consumers.

Respectfully submitted,

/s/ J. David Grossman

J. David Grossman  
Vice President, Policy & Regulatory Affairs

/s/ Rachel Nemeth

Rachel Nemeth  
Senior Director, Regulatory Affairs

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<sup>6</sup> 46 C.F.R. § 2.1204 (a)(3)