



October 12, 2012

Walter Clemence  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Smart Meter Workshop – Silver Spring Networks Response

Dear Mr. Clemence,

Attached, please find Silver Spring Networks response to question six from the Smart Meter Workshop.  
Should you have any additional questions, please feel free to contact me.

Regards,

A handwritten signature in black ink, appearing to read "Don Reeves", written in a cursive style.

Don Reeves  
SVP, Smart Grid Services & Operations

cc: Robert Onsgard, FPL



As part of the comments to the Smart Meter Workshop, FPL would like SSN to send a response to Staff for Roundtable question #6 - *What is the FCC's approval process for a smart meter transmitter?*

Silver Spring Networks uses a certified third-party test lab to ensure our products are compliant with CFR (Code of Federal Register) Part 15. The lab is certified by the US Federal Communications Commission (FCC) and authorized to issue grants, within its scope of designation, for equipment subject to the FCC's certification procedure. Under the FCC rules, a TCB (Telecommunications Certification Body) has the authority to review and grant an application for certification to the FCC rules. TCBs are required to be accredited in accordance with ISO/IEC Guide 65 (1996), General Requirements for Bodies Operating Product Certification Systems and the appropriate FCC Rules. In the United States this is done by the National Institute of Standards and Technology (NIST).

*Per the FCC's Program Roles and Responsibilities, the following stipulates the programmatic approach to testing and certifying equipment. Silver Spring RF mesh devices are certified under FCC CFR 15.247 regulations, which specify spectral occupancy, both frequency spreading and permitted duty cycle:*

#### ***Acceptance of Test Data***

*Equipment subject to certification under Part 15 or 18 of the FCC Rules are required to be tested at measurement facilities that have either been listed with the FCC, or at a recognized accredited testing laboratory. The listing of a test site applies to a specific test facility. When filing an application for certification, the TCB is required to enter the name of the test site from the list of recognized test sites as shown in the Equipment Authorization System (EAS).*

*The process used by the TCB for the acceptance of test data will be reviewed during the ISO/IEC Guide 65 assessment. For certification to Parts 15 and 18, under scope A, the TCB at a minimum needs to require that the product be tested at measurement facilities that have either been listed with the FCC or at a recognized accredited testing laboratory. For certification to the licensed device rule sections of 47 CFR, under scope B, the TCB shall have confidence in the test data as established under the TCB procedure for acceptance of test data.*

*When reviewing the application for certification, including the test report, the TCB should evaluate the following elements of the application for certification to determine the suitability the test data:*

- a. *Clearly defined test procedures*
- b. *Method of test validation*
- c. *Clearly defined test configurations*
- d. *A brief description of the test facilities – photo(s) and block diagram(s) of test setup*
- e. *Calibration dates and traceability of all test equipment*