

Wireless Battery Charging and FCC Compliance

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Wireless battery charging systems have drawn significant attention in both the consumer electronics and automotive markets. Wireless charging offers customers greater convenience and provides manufacturers with an attractive way to differentiate their products. In automotive applications, wireless charging also allows manufacturers to do away with bulky connectors, which may serve as a potential point-of-failure in long-term use.

It may come as a surprise to some that the Federal Communications Commission (FCC) would have an interest in this technology. In fact, however, wireless charging systems generally require FCC approval. The FCC has not conducted a recent, formal rulemaking addressing the issues associated with these systems, but because these systems emit radiofrequency (RF) energy in their charging operation, they fall under the agency's rules on RF-emitting industrial, scientific, and medical (ISM) equipment (Part 18). *See* 47 C.F.R. § 18.101 *et seq.* Moreover, advanced systems may include wireless communications between the charger and the device that contains the battery. Even though these communications may take place across centimeters or less, they still are regulated by the FCC, usually pursuant to its unlicensed device rules (Part 15). *See* 47 C.F.R. § 15.1 *et. seq.*

In the absence of formal rules specifically tailored to wireless charging systems, the FCC's technical staff has worked to ensure that there is a smooth process for applying for and receiving the relevant approvals. The staff has issued a number of informal "Knowledge DataBase" updates that address issues associated with wireless charging. These updates provide important guidance to entities considering or developing regulated products.

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As wireless charging systems continue to grow and expand, it seems likely that the FCC will eventually launch a proceeding to adopt specific rules for these devices. In the meantime, working with the FCC's expert engineering and other staff to interpret existing rules in light of new technologies can often be faster and much less expensive than initiating (or waiting for) a formal rulemaking.

Wiley Rein has extensive experience in FCC equipment authorization. We have assisted numerous clients in gaining the approvals needed to bring new devices to market, and doing so quickly and efficiently with minimum regulatory delay.