C63®

ANSC-C63® Interpretation Request Form

Submission Date	Originator Name, Company
07/06/2024	David Zimmerman, Spectrum EMC, LLC

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This form shall be used for submission of Interpretation Requests related to USEMCSC-IEEE standards that are within the responsibility of ANSC-C63®. The eight parts of the form must be filled out completely, except for the Subcommittee Response, to ensure expedient processing.

Attachments, of any kind, should not be provided and all material related to this interpretation shall be included in this document. If there is supporting information that is relevant to the committee to resolve this interpretation request, it should be provided below the table where indicated.

This completed form is to be submitted to the Secretary of ANSC-C63® via e-mail.

Check one or more (must be included in the request). This clause/subclause/paragraph/figure/table:
✔ is open to more than one viewpoint.
✔ is ambiguous.
☐ appears to be contradicted in normative references or other clauses in the standard.

Standard	Clause / Sub clause	Paragraph Figure/ Table	Type (General/ Technical/ Editorial)	Comment / Inquiry	Subcommittee Response (to be filled in by Subcommittee Chair)

Standard	Clause / Sub clause	Paragraph Figure/ Table	Type (General/ Technical/ Editorial)	Comment / Inquiry	Subcommittee Response (to be filled in by Subcommittee Chair)
ANSI C63.4-2014	10.2.7	N/A	General	Comment: The term "special test software" is ambiguous and open to one or more interpretation. Additionally, the word "software" would appear to include firmware, since the very first sentence in the Wikipedia description of firmware found here (https://en.wikipedia.org/wiki/Firmware) says that In computing, "**firmware** is software…". This definition can also be found at the Oxford Advanced American Dictionary site. It seems possible that at the time this requirement was put into earlier versions of C63.4 that the use of software to gather and process emission data was not as common and therefore "special". Inquiry: What is "special test software" as required by ANSI C63.4-2014, clause 10.2.7?	The term "special test software" is not normatively defined in ANSI C63.4-2014 (nor in ANSI C63.4a-2017). Additionally, the term "special test software" is not normatively defined in ANSI C63.14-2023. The test laboratory is free to define the term "special test software" as it sees fit to do so.

☐ Additional information to support this interpretation request can be found below: