



A2LA Comments on FCC draft KDB 974614

May 1, 2015

Comment #1 - Section 5 (pages 6 & 7) - regarding "Foreign Accredited Testing Laboratories" ... While we understand the current FCC position that accreditation bodies located in the United States are not recognized to accredit foreign testing labs for FCC designation purposes, we kindly ask for reconsideration of this position and suggest a revision to this section that would allow currently recognized TFABs (regardless of country they're located in) to accredit labs in countries where there is no MRA in place with the US. Given the history of implementing other MRAs (such as US-Mexico and US-Israel), it seems unrealistic to expect all of these economies to implement operational MRA's within the one year transition period outlined in R&O 14-208. There are numerous countries that currently have 2,948 listed labs on the FCC website, but do not have an operational MRA in place with the US. As an alternative suggestion, we would also recommend that the FCC develop and adopt a separate procedure for recognition of accredited test labs that are located in countries with no MRA in place with the US.

Comment #2 - Section 6, Table 2 (page 9) - Included with the Scope for "RF Radiation Exposure", is a "Note" in the Test Methods column. The note provides a hyperlink to KDB 447498. Typically we understand "Notes" to be informative, but this table leads us to believe that this KDB must be included on scopes of accreditation for test labs wishing to be accredited for the RF Radiation Exposure Scope. We would appreciate clarification as to whether or not KDB 447498 shall be included on Scopes of Accreditation.

Comment #3 - Section 6, Table 2 (page 9) - Included with the Scope for "Part 20 Hearing Aid Compatibility (HAC)", are test methods ANSI C63.19-2007 and ANSI C63.19-2011. The table seems to indicate that both of these shall be included on the Scope of Accreditation. We would appreciate clarification here, and would suggest that an "or" statement be included if it is unnecessary to include BOTH standards (similar to the currently published Table).

Comment #4 - Section 7 (page 10) - regarding "Technical Assessment Evaluation" ... With the update of this KDB 974614, we believe the corresponding Technical Assessment Checklist (KDB 853844) should be updated and published concurrently to avoid any confusion during laboratory assessments.

Comment #5 - Section 9 (page 11) - regarding "Transition Period for New Measurement Methods" ... It would be helpful to reference the FCC rule part where transition periods are outlined. The current KDB 974614 (April 2014), allows for a transition period to update scopes of accreditation within the next re-assessment or surveillance cycle, but in no case longer than two years; so the proposed change to this section seems much different than the current process.

Respectfully,

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