

**A2LA Comments on FCC draft KDB 641163**

January 21, 2016

**Comment #1 – Section I (page 8)** – The reference to the “core” test capabilities within DA 99-1640 may be in need of update. It appears there are currently references within DA 99-1960 that do not align with test requirements in Table 3 of this KDB (641163). For instance, DA 99-1960 requires site attenuation measurements per ANSI C63.4-1992 for unlicensed radio, and hearing aid compatibility measurements per ANSI/EIA/TIA standards that are now outdated (which the TCB’s test lab would be able to sub-contract). We suggest removing the reference to DA 99-1960 and instead list the “core” test capabilities directly in this KDB publication.

**Comment #2 – Table 3 (page 9)** – This newly added table is helpful in clarifying the core tests that a TCB’s test lab must have listed on their ISO/IEC 17025 Laboratory Scope of Accreditation. However, in comparing this table against Table 2 within the current FCC Test Firm Roles and Responsibilities document (KDB 974614), there seem to be discrepancies regarding the scope of accreditation for testing performed in support of Certification. It would be very useful to align these two tables for consistency purposes.

**Comment #2 – Section J, sentence 2 (page 11)** – The sentence states that the TCB’s 17025 scope must meet the requirements of KDB 974614; however, as mentioned in our comment #2 above, this is inconsistent with Scope requirements identified in Table 3 of KDB 641163.

**Comment #4 – Section K, paragraph 4, sentence 1 (page 11)** – States that each employee that performs tasks of “Evaluation, Review and Certification Decision” shall be interviewed. It is our understanding that employees that perform “Application Review” must also be interviewed by the accreditation body and are considered Key Personnel. We suggest adding “Application Review” as another listed conformity assessment task in this sentence. This would also make for consistency with section N, sentence 2 (page 13) of this draft KDB.

**Comment #5 – Table 4 (page 12)** – We suggest adding additional key employee types of “Evaluator” and “Application Review” to the table. Sections K, L, and N of this draft KDB lead us to believe these are regarded as key employees.

**Comment #6 – Section L, item 7, sentence 2 (page 13)** – This sentence seems to imply that the TCB can outsource the entire evaluation activity defined in Table 2, which contradicts the first bullet point at the bottom of page 5. We seek clarification on this activity, and suggest possible revision to this section.

Respectfully,

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A2LA