



A2LA Comments on FCC draft KDB 974614

March 25, 2016

Comment #1 – Section 5 (Page 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, Paragraph 4 (Page 8) states that “accrediting bodies shall provide the FCC with a list of scopes, based on Table 1 below, which the testing laboratory was assessed to and is in compliance with.” We suggest specifying how the Accreditation Bodies shall provide this information to the FCC (i.e. via email, comments on FCC Test Firm Modification Page).

Comment #3 – Section 6, Paragraph 5 (Page 8) specifies that an accredited testing laboratory cannot be recognized for partial scopes; however, the laboratory can meet the full requirements using multiple testing locations of the same company at different locations within the same country. We suggest removing the last sentence in the paragraph (the option to allow a testing laboratory to meet the requirements using multiple testing locations of the same company), and instead retain the current process of designating individual test firms on the FCC OET website. If the overall company were recognized, the Accreditation Bodies and FCC would need to track the overall company to ensure that all of the requirements are met, which portions of the requirements apply to which specific laboratory locations, and ensure that the specific laboratory locations they have been assessed and approved for the partial requirements that apply. If the goal is to alleviate administrative burden, the approach as listed in the draft may be counterproductive.

Comment #4 – Section 9, Paragraph 1 (Page 12) is addressed in Section 5, Paragraph 1. We suggest removing this content of this section.

Comment #5 – Change Notice 02/23/2016, Page 13-14 states that Section 9 was revised concerning the recognition of multiple test facilities associated with an accredited testing laboratory. It doesn’t appear that this is addressed under Section 9.

Respectfully,

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