



**Supplementary Criteria for Accreditation
United States Federal Communications Commission
Accreditation of Testing Laboratories for RF Equipment Authorisation**

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AS LAB C3.1

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1 Introduction

1.1 International Accreditation New Zealand's (IANZ) Supplementary Criteria provide supplementary information to the General Criteria for Accreditation for specific types or groups of tests or calibrations. They provide detail or add extra information to the generally stated requirements of IANZ General Criteria for Accreditation and IANZ Specific Criteria for the particular field.

1.2 This supplementary criteria details the specific requirements covering the accreditation of laboratories seeking recognition by the United States Federal Communications Commission (FCC) as an accredited laboratory undertaking testing in support of the certification or Declaration of Conformity or verification of Radiofrequency (RF) Equipment (RF devices) Authorization by the Commission's Office of Engineering and Technology (OET).

1.3 This is a supplementary document to IANZ Specific Criteria 3 (AS LAB C3), which includes requirements for electrical testing laboratories generally. This document must be read in conjunction with the current issues of following standard and IANZ publications:

- (a) ISO/IEC 17025 *General Requirements for the Competence of Testing and Calibration Laboratories*
- (b) *Specific Criteria for Accreditation: Electrical Testing (AS LAB C3)*
- (c) *Procedures and Conditions for Accreditation (AS 1)*

1.4 The FCC regulations relating to radiofrequency use in the United States is set out in Title 47 of the Code of Federal Regulations (47 CFR), Chapter I, Subchapter A, Part 2. In particular, Subpart J (Parts 2.9xx – 2.10xx) details Equipment Authorization Procedures. The specific requirements for the recognition of accredited testing laboratories are detailed in Part 2.948. For New Zealand laboratories seeking FCC recognition under Part 2.948, the laboratory must be accredited by an accreditation body recognized by the FCC under the provisions of Part 2.949.

1.5 In 2016, New Zealand became a Signatory to the Asia Pacific Economic Cooperation (APEC) Mutual Recognition Arrangement (MRA) for Conformity Assessment of Telecommunications Equipment (the APEC TEL MRA). Following this, in early 2017, the United States and New Zealand initiated Phase I Procedures of the MRA for equipment that is subject to mandatory conformity assessment procedures for electromagnetic compatibility (EMC) and radio standards. Under this arrangement, the FCC is the nominated radio spectrum regulatory authority in the United States and IANZ is the Designating Authority for conformity assessment bodies in New Zealand pursuant to the MRA.

1.6 As the Designating Authority under the APEC TEL MRA, IANZ has sought and obtained recognition from the FCC as a recognised laboratory accreditation body under the provisions of 47 CFR Parts 2.948(f)(1) and 2.949. Thus IANZ accreditations granted in accordance with the criteria set out in this document will be recognized by the FCC for the purposes of Part 2.948.

1.7 To administratively accommodate the specific nature of an accreditation granted in accordance with this document (and subsequent designation as a conformity assessment body under the APEC TEL MRA), laboratories will be granted a separate accreditation (in addition to that held for Electrical Testing) under the IANZ Designated Conformity Assessment Body (CAB) Programme, and specifically under the sub-programme for the APEC TEL MRA (CAB-APEC). This accreditation may be granted only when the organisation has demonstrated conformity with the criteria for accreditation as an Electrical Testing Laboratory and the additional specific requirements set out in this document.

2 Administrative Requirements

2.1 Assessment of Laboratories for FCC OET recognition

In addition to the general requirements for assessment of electrical testing laboratories under the IANZ Electrical Testing Laboratory Accreditation Programme, the following additional requirements will be met for those laboratories seeking accreditation under the IANZ CAB-APEC Programme.

- (a) The laboratory shall maintain an up-to-date 'description of the measurement facilities' as set out in 47 CFR Part 2.948(b)(1) – see Appendix 1. This description shall be provided to IANZ on request (Part 2.948(b)(2)), but generally will only be requested at the time of reassessment as part of the Application for Reassessment submission. The description documentation will be reviewed at each surveillance assessment.
- (b) In accordance with Part 2.948(e), reassessment of CAB-APEC accreditations will be undertaken every two years. Other testing of a similar nature accredited under the general Electrical Testing Laboratory accreditation will be reassessed at least once during the IANZ four-year reassessment cycle. All accreditations will be included in the scope of surveillance assessments between technical assessments.
- (c) Because of the expected small number of laboratories in New Zealand seeking accreditation under CAB-APEC Programme, and the specialist nature of the FCC accreditation criteria that is additional to the general criteria for electrical testing laboratories, IANZ will likely seek the services of Technical Experts outside of New Zealand to join assessment teams at the two yearly reassessments.

These experts will be required to have a working knowledge of the administrative (an acceptable level of experience with the FCC rules and regulations) and technical requirements (an acceptable level of experience with FCC recognised test procedures) for accreditation of laboratories for the purposes of FCC approval. These experts will generally be sourced through IANZ's ILAC MRA partner accreditation bodies (e.g. from the USA) who are active in accreditation of laboratories for FCC recognition. IANZ will seek documentation to support the qualification that the technical experts meet the above criteria, and in all cases, the technical experts will meet the expectations of the US FCC in regard to their qualifications and experience.

Given such experts are likely to charge for their services, the added costs of international travel and the fact that reassessments are conducted every two years, laboratories seeking and maintaining CAB-APEC accreditations can expect increased costs associated with IANZ reassessments given all the aforementioned costs will be recovered directly from the laboratory.

- (d) Where these are available, IANZ will make use of FCC-sourced checklists during the conduct of assessments e.g. the *Accredited Testing Laboratory FCC Technical Assessment Checklist* (FCC KDB Publication 853844).

3 Technical Requirements

3.1 Personnel

IANZ Key Technical Personnel for CAB-APEC accreditations must, in addition to the general requirements of Key Technical Personnel in electrical testing laboratories, be able to demonstrate to an IANZ assessment team:

- (i) A working knowledge of the FCC procedures for the authorization of RF equipment appropriate to their laboratory's role in the authorization process. A sound knowledge of where their laboratory, its recognition and the testing it carries out, fits in the authorization process is expected.
- (ii) A working knowledge of the requirements for accreditation and recognition of their testing laboratory (i.e. Part 2.948, the FCC OET *Accredited Laboratory Program Roles and Responsibilities* (FCC KDB Publication 974614 D01) and this document.
- (iii) A working knowledge of the tests required by the FCC on the particular RF equipment for which authorization is sought, and on the technical conduct of such tests.

3.2 Test Methods, Test Equipment & Facilities and the Scope of Accreditation

The laboratory shall use test methods and test equipment specified or otherwise acceptable to the FCC for the conduct of the tests. The FCC OET *Accredited Laboratory Program Roles and Responsibilities* (FCC KDB Publication 974614 D01), particularly Sections 4, 6 and Appendix A, sets out the testing and test methodology that is within the scope of recognition (and thus the CAB-APEC laboratory accreditation programme) and how scopes of accreditation are to be expressed. This document, and the methodologies and guidance documents called up therein, along with the testing requirements in Part 2.948(d), are considered by IANZ as mandatory criteria for accreditations under this programme.

4 References

1. Title 47 Code of Federal Regulations (47 CFR) Part 2
https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=e23d6e1befa909c82901ca814d457c61&mc=true&n=pt47.1.2&r=PART&ty=HTML#_top
2. Accredited Testing Laboratory FCC Technical Assessment Checklist (FCC KDB Publication 853844)
<https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?switch=P&id=44615>
3. Accredited Laboratory Program Roles and Responsibilities (FCC KDB Publication 974614 D01)
<https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?switch=P&id=44684>