



June 20, 2019

Mr. Brian Butler
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

FCC Request for Public Comment-Reply Comments - DA/FCC #: DA-19-12 / ET Docket No. 19-48

Dear Mr. Butler,

We are writing to express the position of the American Association for Laboratory Accreditation (A2LA) as it pertains to the FCC request for comment regarding Modifying the Equipment Authorization Rules to Reflect the Updated Versions of the Currently Referenced ANSI C63.4a and ISO/IEC 17025:2017 Standards.

By way of background, A2LA is a non-profit, accreditation body with over 3500 actively accredited certificates representing all 50 states as well as internationally. We have been providing accreditation services to ISO standards for over forty years and currently support the FCC through ISO/IEC 17025 Accreditation.

We fully support the FCC and parties that have submitted comments in favor of adopting the ISO/IEC 17025:2017 version of the standard, as it provides benefits to the accredited laboratories, greater value to their customers and it will provide enhancements to the FCC program.

Improvements to the standard include that it is now structurally consistent with other ISO documents, including ISO/IEC 17065:2012. This can facilitate harmonized policies and more efficient operations. ISO/IEC 17025:2017 provides a greater emphasis on impartiality, transparency and the complaint processes. Also, the revised standard takes a process approach and is outcome-focused; thus ISO/IEC 17025:2017 is less prescriptive and less procedure-burdened. The standard provides laboratories with greater flexibility as the standard is now underpinned with a risk-based approach to the processes.

A2LA has been transitioning our organizations to the new standard since November 2017. In order to meet International Laboratory Accreditation Cooperation (ILAC) mandates, the transition must be completed by November 2020. A2LA has been experiencing a smooth transition and fully anticipates meeting the timeline established by ILAC.

We would be pleased to provide more background and elaborate on our comments at your convenience. If interested, please contact me at rquery@A2LA.org or Megan Riebau at mriebau@A2LA.org.

Kind regards,

Randall Query, Director of Government Relations, A2LA