

**NORAND<sup>®</sup>**  
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March 24, 1995

**APR 7 1995**

**FCC MAIL ROOM**

Mr. Bill Caton, Secretary  
Federal Communication Commission  
1919 M Street NW  
Washington D.C. 20554

Re: Comments on NPRM (FCC 95-46) Report No. DC 95-28, ET Docket 95-19

The Norand EMC Test Laboratory is a NVLAP approved site. We have been in the NVLAP program since the start. We have considered cancelling our NVLAP approval due to the cost / benefits. The decision on MRA for the European Union and what happens with the FCC -DoC would determine the faith of the NVLAP. I think NVLAP is closest to satisfying the ISO requirements so my vote is to stay with NVLAP.

Our position is the fastest, shortest route to accreditation for all test methods, such as Cisprr 22, IEC 801-2,-3,-4 etc, is the requirements today. We want our test data to be acceptable in all markets and we want an accrediting body in this county to satisfy the Mutual Recognition Agreement for these other countries. The cost is an issue but secondary to the accreditation priority.

We also support the self certification or declaration of compliance with an North America approval mark. This mark would be used for FCC requirements, plus I would like to expand the scope of this mark to include radio/modem requirements, immunity requirements, and product safety requirements. I envision a Circle divided into three part. One section for radio/modem, another for immunity, and one for product safety

If you have question please call 319-369-3241

Sincerely,



Jack Andrews, Manager  
Norand EMC Testing Laboratory

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