



February 5, 2016

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: Notice of *Ex Parte* Communication, Amendment of Parts 0, 1, 2, and 15 of the Commission's Rules regarding Authorization of Radiofrequency Equipment Amendment of Part 68 regarding Approval of Terminal Equipment by Telecommunications Certification Bodies; ET Docket No. 13-44, RM-11652

Dear Ms. Dortch:

On February 4, 2016 Mark Uncapher, Director of Regulatory and Government Affairs, and K.C. Swanson, Director, Global Policy for the Telecommunications Industry Association ("TIA"),<sup>1</sup> held a telephone conference call with Technical Research Branch Chief, William Hurst, on the status of international efforts to establish, prior to a deadline of July 13, 2016, a Mutual Recognition Agreement ("MRA") process for §2.948 laboratories.

In the Equipment Authorization Reform R&O, the Commission adopted a new accreditation requirements, notably superseding the § 2.948 criteria for unaccredited laboratories that test equipment certified under Parts 15 and 18 of the rules, stating that it will cease to recognize new unaccredited § 2.948-listed laboratories.<sup>2</sup> As the R&O notes "[a] large number of testing laboratories recognized as § 2.948-listed are located in countries that do not have an operational MRA and are not eligible to be recognized by the FCC until procedures for recognizing laboratories in non-MRA countries are in place."

The discussion also touched on the status the Commission's consideration of TIA's Petition for Clarification and/or Reconsideration requesting that the Commission (1) implement its policies for the re-certification of laboratories in countries without a telecommunications

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<sup>1</sup> TIA is a Washington, DC-based trade association and American National Standards Institute (ANSI)-accredited standard developer that represent the global information and communications technology ("ICT") manufacturer, vendor, and supplier community. TIA represents approximately 500 participating companies producing products and services empowering communications in every industry and market, including healthcare, education, security, public safety, transportation, government, and the military, the environment, and entertainment. See <http://tiaonline.org/>.

<sup>2</sup> See Amendment of Parts 0, 1, 2, and 15 of the Commission's Rules regarding Authorization of Radiofrequency Equipment; Amendment of Part 68 regarding Approval of Terminal Equipment by Telecommunications Certification Bodies, Report and Order, ET Docket No. 13-44, RM-11652; 29 FCC Rcd 16335 (2014) ("Equipment Authorization Reform").

MRA in place and which were accredited by a Commission-recognized accreditation body; (2) provide clarification on the path forward to re-certification for § 2.948- listed laboratories in non-MRA countries as soon as possible; and (3) provide a period of two years once this process is finalized and made public for such laboratories to undergo and complete such process.<sup>3</sup>

Pursuant to Section 1.1206 of the Commission's rules,<sup>4</sup> this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Mark Uncapher

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cc:  
William Hurst, FCC  
K.C. Swanson, TIA

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<sup>3</sup> See TIA Petition for Clarification and/or Reconsideration Equipment Authorization Reform proceeding, (July 13, 2015)

<sup>4</sup> See 47 C.F.R. § 1.1206.