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July 29, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
Room TW-A325
445 12th Street SW
Washington, D.C. 20554

Re: Ex Parte, Supplemental Comments In the Matter of Public Notice dated June 10, 1999, Common Carrier Bureau announcement to hold fora on deregulation/privatization of equipment registration and telephone network connection rules (47 C.F.R. Part 68), CC Docket No. 99-216, DA99-1108

Dear Ms. Salas:

On July 12 and 13, 1999, members of the Telecommunications Industry Association User Premises Equipment Division ("TIA UPED") participated in open fora with the Federal Communications Commission ("FCC") staff to discuss deregulation/privatization of Part 68 equipment registration and telephone network connection rules. At this time, the Commission was informed that TIA's UPED was in the process of preparing a Petition for Rulemaking in the matter of an Amendment of the Commission's Part 68 Rules for Expanded Use of the Declaration of Conformity Equipment Authorization Processes.

After participation in the Commission's open fora, as a consequence of conferring with FCC staff, and subsequent to discussion with TIA members and staff, TIA now believes that in order for the Commission to more expeditiously consider all issues in one proceeding, UPED should provide its proposal in the form of Supplemental Comments to CC Docket No. 99-216, and not as a Petition for Rulemaking.

As a result, TIA hereby respectfully submits the attached Supplemental Comments subsequent to the Commission's fora on deregulation/privatization of equipment registration and telephone network connection rules (47 C.F.R. Part 68), CC Docket No. 99-216, DA99-1108.

Thank you.

Sincerely,

Roberta E. Breden

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## Table Of Contents

SUMMARY ..... 1

INTRODUCTION ..... 3

BACKGROUND ..... 5

Purpose of Part 68 ..... 5

FCC - TR-41 Partnership for Public Welfare and Safety ..... 6

Existing FCC DoC Program For Part 15 ..... 6

RATIONALE AND BENEFITS FOR DoC EXPANSION ..... 7

Benefits and Arguments for DoC Now ..... 7

Reduced Time to Market Benefits Consumers, Industry and Government ..... 8

IMPLEMENTATION CONSIDERATIONS ..... 10

Proposed DoC Process ..... 10

Database for DoC ..... 12

Product Marking and Labeling ..... 14

Enforcement Considerations ..... 15

CONCLUSION ..... 15

ANNEX A – CLARIFICATION OF CONFORMITY ASSESSMENT TERMINOLOGY ..... 17

## SUMMARY

In its earlier comments[1] in response to the June 10, 1999 public notice DA 99-1108 to generate discussion regarding the further deregulation and privatization of Part 68, part of the Commission's open proceeding CC Docket No. 99-216, the Telecommunications Industry Association ("TIA") advised the Commission that it was considering filing a Petition for Rulemaking ("PRM") to change the equipment authorization process for equipment subject to Part 68. After participation in the open fora on July 12 and 13, 1999, TIA now believes that in order to expeditiously consider all issues in one proceeding, TIA should provide its proposal in the form of Supplemental Comments and not a PRM. Thus, TIA respectfully requests a change in the equipment authorization procedure from Federal Communications Commission ("FCC") Certification (previously known as Registration)[2] to the FCC Declaration of Conformity ("DoC") process similar to what is defined in Part 2 [hereinafter "FCC DoC" will be used in order to distinguish the term from other regional and international uses of the term SDoC][3]. TIA also notes that Telecommunication Certification Bodies ("TCBs") will exist

[1] TIA letter to Ms. Magalie Roman Salas, Secretary, Federal Communications Commission, dated July 2, 1999.

[2] 1998 Biennial Regulatory Review -- Amendment of Parts 2, 25 and 68 of the Commission's Rules to Further Streamline the Equipment Authorization Process for Radio Frequency Equipment, Modify the Equipment Authorization Process for Telephone Terminal Equipment, Implement Mutual Recognition Agreements and Begin Implementation of the Global Mobile Personal Communications by Satellite (GMPCS) Arrangements, *Report and Order*, GEN Docket No. 98-68, FCC 98-338 (1998), para. 51

[3] 47 C.F.R. 2.906 (the current Rules found in §2.906 provide a convenient starting point for the proposed Rule change. TIA notes that the Commission's use of the term "DoC' differs from the similar terminology 'Suppliers Declaration of Conformity' ("SDoC") more commonly used worldwide to mean a similar process. Specifically, laboratory accreditation is an integral part of a FCC DoC program. Such a requirement is not integral to what is more universally understood as a SDoC program (refer to Annex A of

as a result of FCC Docket No. 98-68. Manufacturers of telecommunications equipment would of course have the option of availing themselves of the TCB process in addition to the proposed FCC DoC.

The public will benefit from a simplified FCC equipment authorization process by having access to advanced telecommunications equipment sooner and at lower cost. The Commission will realize lower operating costs, and industry will have a simpler and more efficient equipment authorization process. Furthermore, the Commission would realize a net increase in resources for reallocation to other initiatives. Adopting a simplified authorization process for equipment subject to Part 68 at this time would be consistent with international trends to move away from third-party certification.

Most important to recognize is that relaxation of the equipment authorization process applied to Part 68 would not subject the public telecommunications networks to significant increased risks. After twenty years of experience with the deregulated customer premises equipment ("CPE") market, manufacturers have a good understanding of the technical issues associated with producing equipment that does not harm the Public Switched Telephone Network ("PSTN"). In fact, manufacturers advise the Commission on such matters, frequently at the Commission's request.

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these supplemental comments). TIA believes this confusion would be alleviated if the FCC were to migrate to internationally accepted terminology such as that provided in ISO/IEC Guides 2 and 22).

## INTRODUCTION

Recent international trends in conformity assessment reform suggest that the markets for telecommunications and other information technology equipment are being targeted for further trade liberalization and facilitation. Authorization procedures resembling FCC Verification and FCC DoC by the Manufacturer or Supplier are not new and have been successfully adopted in many different countries for various disciplines (*e.g.*, Safety, electromagnetic compatibility ("EMC"), and terminal attachment requirements)[4]. Telecommunications equipment is recognized as being important to the vitality of each economy's information infrastructure and to the Global Information Infrastructure ("GII") as a whole. The confidence in the conformity assessment capabilities of manufacturers derived from the wave of Mutual Recognition Agreements and Arrangements (a.k.a., MRAs) negotiated in recent years has prompted some of the MRA signatories, such as the European Union, Australia, and Singapore, to move immediately to a Supplier's Declaration of Conformity process for equipment authorization.

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[4] Some initiatives include:

- Transatlantic Business Dialogue ("TABD") Mid Year Report (1999) Technical Annex which calls for Good Regulatory Models and common objectives, including moving on a sector by sector basis to a wider use of Supplier's Declaration of Conformity, combined with Market Surveillance, in place of third party certification (http://www.tabd.com).
- European Union R&TTE Directive (the EU R&TTE Directive is DoC based and applies to the types of equipment subject to Part 68 in the US).
- Asia Pacific Economic Cooperation, Subcommitte Standards and Conformance ("APEC SCSC") May 1999 Meeting Report (the APEC SCSC continues to work with industry to develop a DoC proposal for personal computers and peripherals, initially, and other information technology equipment thereafter, including telecommunications equipment.

The FCC currently has three equipment authorization procedures for its technical rules: Certification, FCC DoC, and Verification. The FCC application of DoC is currently limited to the authorization process for personal computers and peripheral devices subject to Part 15 electromagnetic compatibility requirements.[5]

In FCC 98-338, the Report and Order on Docket No. 98-68 [hereinafter the Order] which allows for private third parties to conduct Certification of telecommunications equipment, the FCC provided that, "the record does not yet contain sufficient information or analysis to ensure that it would be fair and equitable to [place terminal equipment subject to Part 68 registration under a DoC program]."[6] The Order also indicated that, the FCC may consider expanding the DoC program in future proceedings where the relevant issues may be investigated and resolved. On June 10, 1999, the FCC released a public notice DA 99-1108 to generate discussion regarding the further deregulation and privatization of Part 68, part of the Commission's open

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- Australia and Singapore also have implemented DoC specifically for the types of equipment subject to Part 68).

[5] Amendment of Parts 2 and 15 of the Commission's Rules to Deregulate the Equipment Authorization Requirements for Digital Devices [47 CFR Part 2 and Part 15] *Report and Order*, ET Docket No. 95-19, DA 96-208

[6] 1998 Biennial Regulatory Review -- Amendment of Parts 2, 25 and 68 of the Commission's Rules to Further Streamline the Equipment Authorization Process for Radio Frequency Equipment, Modify the Equipment Authorization Process for Telephone Terminal Equipment, Implement Mutual Recognition Agreements and Begin Implementation of the Global Mobile Personal Communications by Satellite (GMPCS) Arrangements, *Report and Order*, GEN Docket No. 98-68, FCC 98-338 (1998), para. 13.

proceeding CC Docket No. 99-216.[7] Specifically, the FCC sought input on further streamlining of the certification procedural rules.[8] Fora were held on July 12 and 13. This filing augments the TIA statements provided during the Fora and is not intended to change Part 68 technical requirements.

In view of the recent signing of MRAs with Europe and APEC, and the pending work in the Inter-American Telecommunication Commission ("CITEL") MRA, TIA believes the timing is particularly appropriate to review the relevancy of FCC DoC to equipment of the type subject to Part 68. Furthermore, Australia, the European Community, and Singapore have either adopted or have decided to adopt a comprehensive implementation of SDoC principles for similar telecommunications equipment.

## BACKGROUND

### Purpose of Part 68

Part 68 was phased-in during the mid 1970's to apply certain technical requirements to the design and manufacture of customer provided equipment in order to avoid harms to the Public Switched Telephone Network ("PSTN").

[7] On Deregulation/Privatization of Equipment Registration and Telephone Network Connection Rules [47 C.F.R. Part 68], *Public Notice,* CC Docket No. 99-216, DA 99-1108, (1999)
[8] *Id.* at 2.

**FCC - TR41 Partnership for Public Welfare and Safety**

Industry fora continue to partner with the FCC to bring advanced technology to the public in a manner consistent with the Commission's responsibility for maintaining the public's welfare and safety. The TIA User Premises Equipment Division ("UPED") dedicates resources of several engineering subcommittees to address FCC, public interest, and industry needs. Five of these subcommittees are:

- TR-41.2 subcommittee on conformity assessment
- TR-41.3 subcommittee on hearing aid compatibility and other issues
- TR-41.7 subcommittee on telephone RF immunity and other issues
- TR-41.9 subcommittee on regulatory considerations
- TR-41.11subcommittee on FCC administrative considerations

These subcommittees address FCC public interest concerns including, harms to the PSTN, Part 68 technical and administrative matters, and technical issues in trade facilitation and trade liberalization conformity assessment and testing programs.

**Existing FCC DoC Program for Part 15**

As defined in Section 2.906 of the FCC Rules, a FCC DoC is a procedure where the responsible party (supplier, assembler, importer, etc.) makes measurements and takes other necessary steps to ensure that the equipment complies with the appropriate technical standards. The responsible party must uniquely identify equipment subject to FCC DoC in a format not to be confused with the FCC identifier used on certified equipment[9]. The responsible party warrants that each unit of equipment marketed under

[9] 47 C.F.R. 2.1074.

a FCC DoC is identical to the unit tested, and is found acceptable with respect to the standards. The responsible party also maintains records that reflects this position and facilitates positive identification for each device.

The FCC also requires that the laboratory testing a product under the DoC authorization procedures be accredited for performing such measurements by a FCC-authorized accreditation body. Section 2.948 of the FCC Rules requires the use of certain International Standards Organization ("ISO") and International Electrotechnical Commission ("IEC") guides for accreditation and approvals, yet the ISO Guides 2 and 22 on definitions and DoC respectively are silent on accreditation (refer to Annex A for more details).

In summary given the support of TIA and the experience gained in implementing DoC for Part 15, the next logical step is for Part 68 to move to FCC DoC.

## RATIONALE AND BENEFITS FOR DoC EXPANSION

### Benefits and Arguments for DoC Now

The manufacturers of telecommunications and information technology equipment are increasingly faced with ever decreasing development and manufacturing cycles. It is extremely important, under these conditions, to reduce all delays in getting the new equipment to the market place. The delays associated with regulatory approvals can easily add delays on the order of 30 days or more, even after tests have shown that the equipment meets the applicable regulatory requirements. It is in this context that the

judicious application of certain DoC principles (i.e., the declaration itself), coupled with appropriate post market surveillance and adequate penalties because of non-compliance, can be a great advantage to manufacturers, and provide assurance to the carriers that CPE is compliant.

**Reduced Time to Market Benefits Consumers, Industry, and Government**

Reducing time to market provides substantial benefits for consumers, industry, and government. It allows the consumer access to new technologies sooner and at reduced costs, as will be discussed below. Information technology products such as telecommunications and computer products have relatively short market life cycles when compared to other product sectors. The rapid pace of technology keeps these market life cycles short. Therefore, it is critical that manufacturers be capable of entering the marketplace as soon as compliance with the applicable technical regulatory standards has been established through initial product testing, performed either by the manufacturer's laboratory or by a third party test laboratory. If FCC DoC is applied to telecommunications terminal equipment subject to Part 68 technical regulations, significant reductions in time to market and conformity assessment costs will result.

The current turnaround time for the certification of such equipment is 14 to 21 calendar days or 10 to 15 business days. On average, there are 40 to 80 applications in the queue for certification of such equipment at any given time. This queue starts at the Mellon Bank, where an average of five to eight business days is spent processing the fee ortion of the application. The remaining two to seven business days are spent at the

Common Carrier Bureau ("CCB") conducting a technical and procedural review of the product Certification application itself.

However, this is not the end of the delay. Once the CCB has completed a successful application, the CCB assigns a unique FCC identifier. Only at that point can the manufacturer generate and attach the required FCC labeling, a process that can add an additional three to five business days to the process. Therefore, it is reasonable to conclude that there can be an average of 21 to 28 days of delay, directly and indirectly associated with the current FCC Certification process for equipment subject to Part 68 requirements. Under the FCC DoC process, the manufacturer can market product within a single day after the product passes all tests for compliance, an elimination of 20 to 27 days of market delay. Furthermore, under the FCC DoC process, the FCC identifier would become unnecessary providing an additional cost savings for consumers, government, and industry.

A significant benefit from decreased time-to-market is the cost difference between an old and new product times the number of products sold during the period between early market introduction and normal introduction. The cost for new information technology products is frequently lower than the cost for older technology products.

To illustrate, assume a product sells at a rate of 20,000 units per week and costs $35. If it is to be replaced by a new design that costs $30, then an improvement of four weeks in time-to-market will save $5 per unit times 20,000 units per week times four

weeks for a total of $400,000. Of course, only a portion of this saving will go to the manufacturer. To stay competitive the manufacturer will be forced to reduce the price of the new product when it is introduced so that most of the saving will go to consumers in the form of lower prices. If all of the saving on the thousands of telephone products introduced each year is totaled, the result could easily be on the order of hundreds of millions of dollars per year.

The savings to Government under a DoC scenario are significant as well. The Mellon Bank and CCB process approximately 3000 applications per year. A move to DoC would eliminate the time it takes to review these applications. This reduction in administrative costs would allow these resources to be redirected.

To summarize, in many cases documented by manufacturers over the years, the actual delay to market access can frequently be on the order of four to five weeks. This translates to a rate of thousands to perhaps millions of dollars in lost sales opportunity on a daily basis and delayed access to new technologies. Consequently, the total impact to consumers and manufacturers is staggering.

## IMPLEMENTATION CONSIDERATIONS

### Proposed DoC Process

Certain Rules will need to be modified or deleted if the FCC DoC process replaces Certification. TIA and TR-41 are willing to work with the Commission to

identify the rule changes necessary. Some examples of rules that will need to be reviewed are:

68.2 - Scope

68.102 - Registration Requirements

Part 68 Subpart C - Registration Procedures

Part 68 Subpart D - Conditions for Registration

Part 2 Subpart J - Equipment Authorization Procedures

Part 2 Subpart L - Registration of Telephone Terminal Equipment Registration Procedure

This proposal introduces several administrative considerations regarding labeling, forms, Customs and database concerns and the possible utilization of the Internet. Any DoC-related labeling provisions must be considered in light of the increasing number of labels required to be affixed to the product surface worldwide.[10] US Customs Service considerations will likely necessitate changes to its documentation. Specifically, the references to the Commission's Form 484, indicating a Part 68 Grant has been issued, will need to include references to the existence of a DoC.[11]

[10] 47 C.F.R. 68.300

[11] Note: the FCC Grant has proved invaluable in obtaining market access to many developed and developing economies who consider a FCC Grant, and the corresponding Form 484 certificate, as a strong indicator of product quality and a measure of confidence that the equipment will present no harm to the economy's Public Switched Telephone Network.

Issues concerning test file retention, such who should retain the test file, and for how long, will need to be reviewed. The utility of the Internet through the use of web sites in providing consumers, regulators, and enforcement personnel critical product technical and conformity assessment information must be explored. The application of international SDoC forms such as those described in ISO/IEC Guide 22 also need to be reviewed. Finally, the utility of a DoC informational database needs to be explored. TIA and TR-41 stand ready to address these issues in the cooperative fora discussed *supra.*

**Database for DoC**

In the FCC 98-68 Order, the Commission stated, "[w]e conclude that it is necessary to maintain a common database of certified equipment . . . a common database will allow the Commission to verify whether a piece of equipment was approved without having to locate the TCB that approved it and obtaining their records."[12] We believe that the concern over determining if a piece of equipment is compliant can be addressed without the need for the FCC to maintain a common database listing all authorized equipment. If a database is required, TIA believes that only a small database listing the grantee codes that identify parties responsible for product compliance will satisfy the requirement.

[12] 1998 Biennial Regulatory Review -- Amendment of Parts 2, 25 and 68 of the Commission's Rules to Further Streamline the Equipment Authorization Process for Radio Frequency Equipment, Modify the Equipment Authorization Process for Telephone Terminal Equipment, Implement Mutual Recognition Agreements and Begin Implementation of the Global Mobile Personal Communications by Satellite (GMPCS) Arrangements, *Report and Order*, GEN Docket No. 98-68, FCC 98-338 (1998), para. 42.

Under Part 15, certified products must be marked with a number that consists of two elements. The first is the FCC grantee three-character code that uniquely identifies the manufacturer/supplier of the equipment. The second is a product specific identifier. Since the manufacturer/supplier is required to obtain this grantee code from the FCC once for all products it produces, the FCC has in its records the information necessary to contact the manufacturer/supplier if the need arises.

Although it is not required, a system similar to this could be used for equipment under the DoC method to indicate compliance with Part 68 of the Rules and provide the Commission with the common database it requires. In fact, the current certification number issued by the CCB already contains a grantee code. If only this three-character code was marked on the product, the CCB would have in its database all the information it needs to contact the company responsible and request proof of compliance as stated in its declaration. This code would be the same for all products produced by that manufacturer/supplier. Companies with Part 68 or Part 15 certified products already have the grantee code if they wish to use this grantee code labeling scheme for new products. Those companies without this code would only need to make a one-time application to obtain it. Since this could be done separately and well in advance of product introduction, it need not delay a company in getting its product to market. Using this system, overhead maintenance is low while still allowing the FCC to access a common database of companies that have product in the marketplace. The FCC Part 68 operations office currently processes about 3000 applications per year. Using the Part 68 grantee code labeling recommendation, the FCC workload would be reduced to

processing only new grantee codes, currently about 600 per year (calculated from Part 68 certification database records).

If the FCC felt that a common database was required as suggested above, and it did not have the available resources to manage the granting of these codes or the maintenance of the grantee code database, this management function could be subcontracted to another body. It is suggested that those entities for which this database is intended provide the resources necessary to maintain it.

It can be noted, however, that this grantee code labeling recommendation will work regardless of the approval process that is utilized by a manufacturer (certification via TCBs or FCC DoC).

**Product Marking and Labeling**

If the FCC chooses the grantee code labeling recommendation, this code will need to be marked on the product to facilitate traceability. To avoid confusion between this grantee code for Part 68 and the FCC identifier used to indicate compliance with Part 15, we are suggesting that the Part 68 marking include indication that it is for Part 68 compliance (e.g., FCC Part 68 ID: xxx). This helps eliminate confusion over the meaning of a second FCC mark.

As a preferred alternative to the grantee code labeling recommendation, the FCC could implement the Part 68 DoC as defined in Part 2. This does not require that a

number or marking that is unique to a specific model or manufacturer be obtained from the Commission. Since it requires that the FCC logo as defined in Part 15.19(b) is to be marked on the product, TIA suggests that the CCB use this same mark to indicate Part 68 compliance. With this, only one mark would be required for both Part 15 and Part 68 compliance. A notice in the customer instructions would then indicate that the FCC logo on the product meant compliance with Part 15, Part 68, or both.

**Enforcement Considerations**

It should be noted that no amount of accreditation requirements can address willful infringement of the Commission's rules. Intentional violators of Part 68 requirements can be most appropriately addressed via substantial enforcement provisions and the appropriate sanctions. Many regulators who have adopted SDoC procedures have included sanctions for manufacturers, suppliers, and agents who negligently or fraudulently misuse the SDoC process for equipment authorizations. Consequently, TIA believes that any relaxation in the authorization process from Certification must be accompanied in an increase in the visibility of enforcement.

## CONCLUSION

TIA respectfully requests the FCC change the equipment authorization process for equipment subject to Part 68 to include the Declaration of Conformity ("FCC DoC") process as outlined in Part 2.[13] As a result, the public will benefit by having access to advanced telecommunications equipment sooner and at lower cost. The Commission will

realize lower operating costs, and industry will have a simpler and more efficient equipment authorization process. A change to FCC DoC for equipment subject to Part 68 at this time would be consistent with international trends in conformity assessment.

Advancing public interest is an important role for the FCC, one long recognized by industry and consumers and endorsed by leading trade liberalization fora. The Certification regime imposes significantly more administrative burdens on the FCC than would be experienced under the FCC DoC regime. Under a DoC program, the FCC would be operating more efficiently, would be promoting competition in the form of lower prices for consumers, and would be providing consumers with a means for quicker access to new technology as it becomes available.

In order to sustain a FCC DoC in practice, industry believes that industry self-policing and peer pressure will tend to minimize FCC enforcement costs. TIA TR-41 stands ready with technical and administrative resources to assist the Commission with further streamlining of the equipment authorization process, and in further developing and implementing the Commission's DoC equipment authorization regime in a manner that advances public policy and welfare.

[13] 47 CFR 2.906 (the current Rules found in §2.906 provide a convenient starting point for the proposed Rule change).

## ANNEX A – CLARIFICATION OF CONFORMITY ASSESSMENT TERMINOLOGY

It is important to understand the Commission's use of the terms "DoC" and "Verification" and what is incumbent in those terms about laboratory accreditation. The terms "SDoC" and "DoC" are too close for them to be used with impunity in this situation. They must be clearly understood in the context of this filing. In some fora, the issue of laboratory accreditation is contentious. Consequently, clarity of understanding of the terminology used is essential to understanding this filing.

ISO/IEC Guide 2:1996 provides the following relevant definitions:

> "Requirement - provision that conveys criteria to be fulfilled" (Paragraph 7.5)
>
> "Conformity - Fulfillment by a product, process, or service of specified requirements" (paragraph 12.1)
>
> "Supplier's Declaration - Supplier gives written assurance that a product, process or service conforms to specified requirements" (paragraph 15.1.1)

And this note also appears with paragraph 15.1.1: "NOTE - In order to avoid any confusion, the expression "self-certification" should not be used."

At no time do any of these definitions specify, infer, imply, or suggest that an accredited laboratory is necessary or required to demonstrate conformity or that lab accreditation is an integral part of conformity or a supplier's declaration of conformity.

In 47 CFR Part 2, the following definitions appear:

> "2.902 Verification . . . is a procedure where the manufacturer makes measurements or takes the necessary steps to insure that the equipment complies with the appropriate technical standards."

> "2.906 Declaration of Conformity . . . is a procedure where the responsible party ... makes measurements or takes other necessary steps to ensure that the equipment complies with the appropriate technical standards."

Taken alone, these definitions would seem to be nearly identical. However, the relevant differentiation comes in Section 2.948, where lab accreditation for the DoC process is required:

> "2.948 Description of measurement facilities . . . (d) If the equipment is to be authorized under a Declaration of Conformity, the party performing the measurements shall be accredited for performing such measurements by an authorized accreditation body based on the . . . ISO/IEC Guide 25...."

The Commission's Verification equipment authorization program most closely resembles the more internationally recognized Supplier's Declaration of Conformity (SDoC) process that does not require laboratory accreditation. Consequently, it is vital that any interested reader, not just the intended audience of this request, the FCC, understands these terms with clarity.