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Public Comments on Authorization of Radiofrequency Equipment:=====

Title: Authorization of Radiofrequency Equipment

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Comment: NIST has two comments it wishes to submit:

1. The FCC should modify §2.949 (b) (2) to indicate that the scope of the NIST laboratory evaluation program is limited to domestic accreditation bodies only. It is suggested that the wording in the brackets in section (2) below be added the Rule to clarify NIST's actual role:

“(2) ..... or, [for laboratory accreditation bodies located in the United States], having OET staff review the report generated by the National Institute of Standards and Technology (NIST) laboratory accreditation evaluation program conducted to support .....”

Reason: Participation in the NIST laboratory accreditation body evaluation program is limited to domestic accreditation bodies that assess U.S. testing laboratories to foreign MRA partner economy requirements. The accreditation body must be located in the United States. Accreditation bodies located outside of the United States are not eligible to participate in the NIST program. This method of demonstrating experience is therefore not available to applicant accreditation bodies located outside of the United States.

2. In section 2.949 (b) (3) the FCC proposes, as an option, that applicant accreditation bodies can offer “other evidence” to demonstrate their experience in the accreditation of EMC/Radio/Telecom testing laboratories instead of undergoing a witness audit or participating in the NIST domestic program referenced earlier. However, no information is provided on the minimally acceptable information that should be submitted as “other evidence.”

NIST suggests that, to promote understanding, transparency and consistency, the proposed rule also provide an explanation of what “other evidence” the FCC will consider probative of the necessary accreditation experience.

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