



Communication Certification Laboratory

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TCB Update: Forces For Change in the World of Conformity Assessment

Keeping up with the latest in technology may be just as difficult as keeping up with the latest conformity assessment regulations. The speed that new technologies are being developed is creating a significant pressure on regulators and certification organizations to find faster and more efficient conformity assessment methods. We are no longer living in small corner of the world and a manufacturer must look to the global marketplace in order to compete. The combination of all these forces is driving governments to reach agreements for the acceptance of test data and certification. This has been evidenced by the overwhelming support of Mutual Recognition Agreements in every region of the world and the creation of Telecommunication Certification Bodies (TCBs) in the United States.

The US-EU Mutual Recognition Agreement and the APEC Mutual Recognition Arrangement have been finalized and are in the process of being implemented. Discussions have started under the auspices of the Inter-American Telecommunication Commission (CITEL) and it is expected that an agreement will be reached within a year.

The US-EU MRA went into force on December 1, 1998. Several organizations in the United States have been nominated as Conformity Assessment Bodies (CABs) for Europe. The MRA provides initially for the mutual acceptance of test data and at the end of a 24-month transition period for the mutual acceptance of certifications.

The APEC MRA is moving ahead at an even faster pace than the US-EU MRA. At the APEC meeting Singapore, held June 1999, eight economies indicated that they are moving ahead to fully implement the APEC MRA: Australia, Chinese Taipei, Singapore, Korea, Japan, Canada, Hong Kong and the United States.

Telecommunication Certification Bodies

To provide for mutual acceptance of testing and certification from all regions of the world the FCC has created Telecommunication Certification Bodies (TCB) in an order adopted December 17, 1998. With this order the FCC is making the move to allow private entities to issue equipment approvals in basically the same manner as the FCC. These new private organizations will be known as "Telecommunications Certification Bodies" (TCBs). This is just the next step the FCC is taking to simplify the equipment approval process. How far the FCC will go in changing the equipment approval process is unclear, but it is certain that change has come to the world of telecommunications conformity assessment. The creation of TCBs comes in concert with a general

relaxation in the conformity assessment procedures used by the FCC. In ET Docket 97-94, the FCC changed many of the equipment authorization requirements to permit the use of supplier Declaration of Conformity.

The FCC is relying on the use of International Standards for the qualification of TCBs. To qualify a TCB must be accredited to ISO/IEC Guide 65 (1996), *General requirements for bodies operating product certification systems*. The specific criteria that a potential TCB must meet in order to qualify for designation was given in a Public Notice dated 17 August 1999. The FCC has clearly stated that, based on the requirement in ISO/IEC Guide 65 for the certifying body to be impartial, a manufacturer will not qualify as a TCB. It is foreseen that test data can still be generated by manufacturer laboratories and submitted to a TCB for certification. Under this new system both manufacturer labs and independent labs may continue to perform testing and submit applications for certification to a TCB. It is expected that the TCB will establish confidence in such test results in a reasonable way without requiring the test laboratory to be accredited to ISO/IEC Guide 25.

Submitting Applications to a TCB

To take advantage of the TCB Program, manufacturers need to start preparing to submit applications directly to TCBs. It will be necessary for manufacturer and independent testing laboratories to demonstrate their competence to the TCB that they will be submitting to. Communication Certification Laboratory is in the process of being accredited to ISO/IEC Guide 65 in order to operate as a TCB. CCL will be qualifying interested parties so that they may submit test reports and applications for certification. Those interested in qualifying to submit applications and test data to CCL should contact: tcb@cclab.com.

Speed of Service

One of the major benefits to manufacturers will be the faster turnaround in obtaining equipment authorizations for their products. CCL is developing its TCB Certification Program with speed of service at the forefront. Applications will be accepted electronically.

Market Surveillance

A critical element in making the new system work is that of market surveillance. Without a credible program of surveillance any conformity assessment system will fail in providing assurance to the user and the regulator that products on the market meet the applicable rules and regulations. The FCC has stated that they intend to redirect resources toward the enforcement of the rules. The FCC will continue to perform surveillance of products that are on the market, by periodically conducting random product testing as well as by investigating allegations of non-compliance. TCBs will also be required to conduct surveillance to supplement the efforts of the FCC. The TCB will be required to test for continued compliance of the products that the TCB has certified and which are being marketed.

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