



Telecom MRAs:
Accreditation and Designation of Conformity Assessment Bodies
Current Topics



- Telecom Mutual Recognition Agreement (MRA) Basics
- US MRA System
- MRA Accreditation Topic: Remote Assessments
- MRA Designation Topic: New US-UK MRA



- Telecom MRA Basics

Agreements

MRAs are government to government agreements for the conformity assessment of telecommunications equipment.

Between Telecom Regulators

MRA Partners

Procedures

MRAs define the procedures for designating, recognizing, and monitoring conformity assessment bodies (CABs):

- Test labs
- Certification bodies
- Notified bodies
- Approved bodies

Recognition of CABs

Acceptance of CAB Results

MRA Partners accept the conformity assessment results of the recognized CABs for regulatory purposes.

Requirements of importing economy always apply

Ease Cost of Trade



- MRAs use the **existing international accreditation system:**

Accreditation bodies: ISO/IEC 17011

Test labs: ISO/IEC 17025

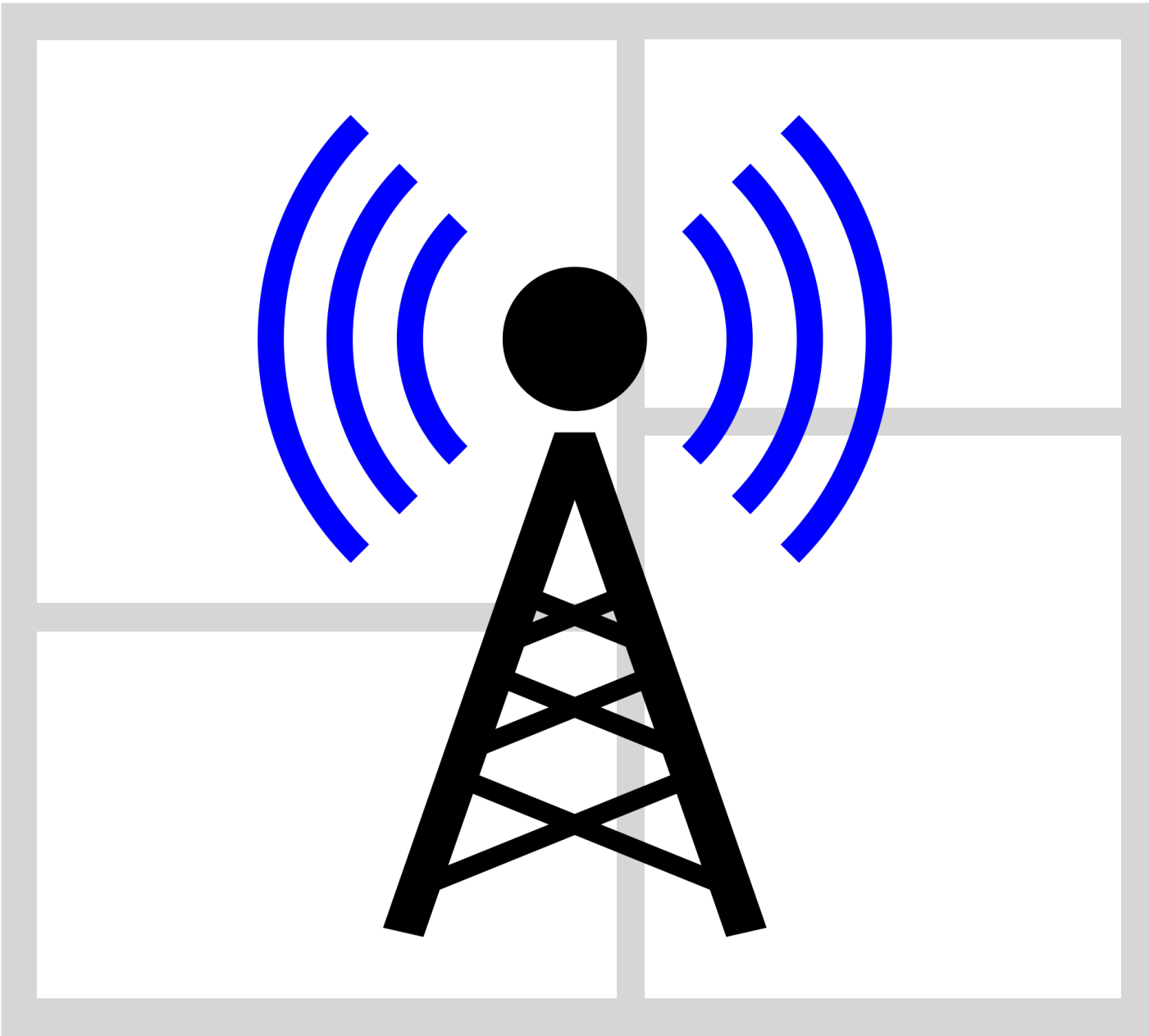
Certification bodies: ISO/IEC 17065

ILAC and IAF

- MRAs require **regulatory transparency**

Technical requirements

Conformity assessment requirements



- US TEL MRA System



MRA
Stakeholders in
US

- Lead US Agency: Office of the United States Trade Representative (**USTR**)
- Regulatory Authority (RA): Federal Communications Commission (**FCC**)
- Designating Authority (DA): National Institute of Standards and Technology (**NIST**)
- Accreditation Bodies (ABs): Select US Accreditation Bodies (**A2LA, ANAB, NVLAP**)

BILATERAL MRAs

Separate agreements:

- Japan
- European Union
- **UK (New)**
- Israel
- Mexico

APEC TEL MRA

Single agreement; bilateral exchange of letters:

- Phase I: Australia, Chinese Taipei, Korea, Malaysia, New Zealand, Vietnam
- Phase I and Phase II: Canada, Hong Kong, Singapore



FCC Equipment
Authorization:
Certification and
SDoC

- FCC Requirements for **Certification**

47 CFR 2.907

- FCC Requirements for **Supplier's Declaration of Conformity (SDoC)**

47 CFR 2.906

FCC Equipment Authorization:

Steps in Certification

Step 1

Testing by an [FCC recognized test lab](#)

Domestic US Labs

Foreign Labs in MRA Countries

Foreign Labs *in non-MRA Countries*

[FCC Test Lab Roles and Responsibilities](#)

MRA not required for this.

Step 2

Certification by an [FCC recognized TCB](#)

Domestic TCBs

TCBs in MRA Countries Only

Not available for CBs in non-MRA countries

[FCC TCB Roles and Responsibilities](#)

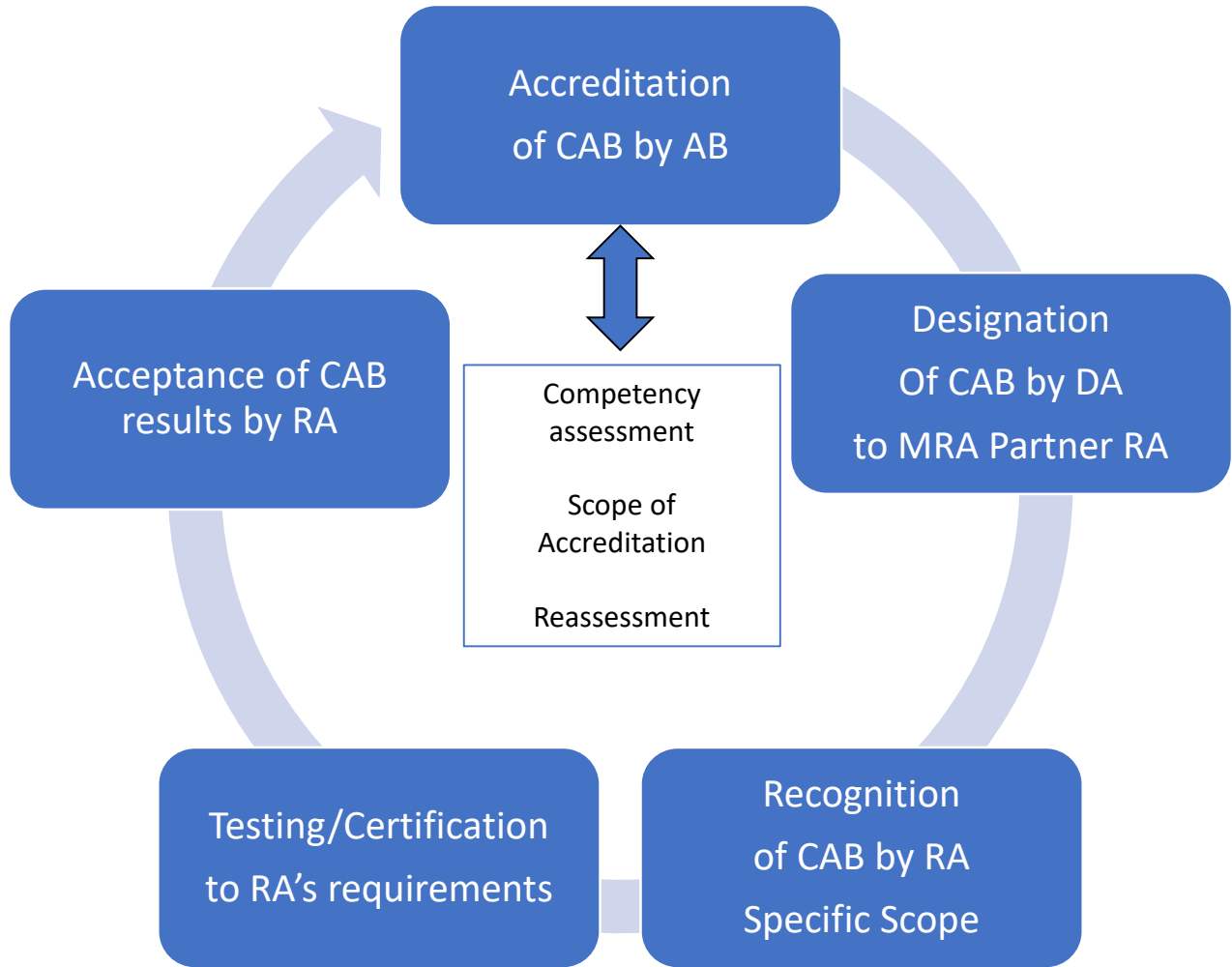
FCC Resources

- [FCC MRA Procedures](#)
- [FCC Accredited Test Lab Program Roles and Responsibilities](#)
 - [FCC Lab Assessment Checklist](#)
 - [FCC Test Firm Search](#)
- [FCC TCB Program Roles and Responsibilities](#)
 - [FCC TCB Assessment Checklist](#)
 - [FCC TCB Search](#)
- [FCC AB Recognition Procedures](#)
 - [FCC Active Test Firm AB \(TFAB\) Search](#)

NIST:
Designating
Authority

- NIST designates US CABs to MRA Partners
~100 US CABs participate
~600 Scopes of Recognition are managed
Designation Requirements of MRA Partners
Recognized US CABs
- NIST designates US TCBs to the FCC
- *FCC Recognized US ABs can accredit and designate labs in non-MRA countries to the FCC*

General MRA Cycle





- MRA Accreditation Topic: Remote Assessments

ISO/IEC 17011 Requirement

INTERNATIONAL
STANDARD

ISO/IEC
17011

Second edition
2017-11

Conformity assessment —
Requirements for accreditation
bodies accrediting conformity
assessment bodies

*Évaluation de la conformité — Exigences pour les organismes
d'accréditation procédant à l'accréditation d'organismes d'évaluation
de la conformité*

ISO/IEC 17011 (7.9.3)

....*The time between consecutive on-site assessments shall not exceed two years.....*

*However, if the accreditation body determines that an on-site assessment is **not applicable**, it shall use another assessment technique to achieve the same objective as the on-site assessment being replaced and justify the use of such techniques (e.g. remote assessment).*

IAF FAQs:

Q34: Can Accreditation Bodies carry out consecutive assessments during the COVID lockdown period using remote techniques?

ISO/IEC 17011 states in 7.9.3 “The time between consecutive on-site assessments shall not exceed 2 years. However, if the accreditation body determines that an on-site assessment is not applicable, it shall use another assessment technique to achieve the same objective as the on-site assessment being replaced and justify the use of such techniques (e.g. remote assessment).”

Therefore is it correct that the AB can justify using alternative techniques in this situation?

A34: *Yes, considering the current restrictions on travel it would be a suitable justification, **subject to risk assessment**, to use remote techniques in consecutive assessments within a 2 year period.*

Travel Restrictions Lead to Remote Assessments **NIST**

- Accreditation bodies have embraced remote assessment techniques to continue the assessments of CABs.
 - Policies issued
 - Assessors trained

Use of video-conferencing platforms such as Zoom/Microsoft Teams

Use of remote techniques for effective technical witnessing

- **CAUTION:** Regulator acceptance of remote assessment in lieu of the on-site assessment may be limited.
 - Some regulators are only allowing use for specific time periods.
 - Others will not accept use of the remote assessment for a new CAB.
 - CABs should verify the requirements with the regulator(s).



Since March 2020, safety concerns related to COVID have led to travel restrictions in many economies.

Examples of AB Guidance and Resources on Remote Assessments

- [A2LA](#)
- *“... extending our remote assessment policy to the end of the second quarter 2021 (June 30, 2021). We will continue to monitor the situation and adjust accordingly.”*
- [NVLAP](#)
 - Bulletin for accredited CABs
- [ANAB](#)
 - Webinar, “Minimizing risks that could affect accreditation when on-site assessment is not possible.”



- IAF Mandatory Document

[IAF MD 4: 2018 on Use of ICT Technologies for Assessments/Auditing Purposes](#)

As information and communication technology (ICT) becomes more sophisticated, it is important to be able to use ICT to optimize audit/assessment effectiveness and efficiency, and to support and maintain the integrity of the audit/assessment process.

- IAF Guidance Document

[See also IAF ID 12: Principles of Remote Assessment](#)



- *Until further decision by the IAF/ILAC JMC or the responsible Regional structure peer evaluations starting from 2021-01-01 can be, and normally will be, performed as fully remote exercises.*

Enables ABs to maintain their ILAC/IAF signatory status



- MRA Designation Topic:
New US-UK MRA

UK – New US-UK Framework MRA

- A [New US-UK Framework MRA](#) was signed on February 14, 2019
 - Telecommunications Equipment Sectoral Annex
 - EMC Sectoral Annex
 - Refers to UK regulations instead of EU Directives
- Entered into force on January 1, 2021 (Day 1)

UK – New US-UK Framework MRA

- Continued Recognition for Some CABs
 - US CABs that were recognized by the UK before (under US-EU MRA) as Notified Bodies became **UK Approved Bodies**
 - UK test labs and UK TCBs that were recognized by the FCC (under the US-EU MRA) remained recognized
- New Recognition for CABs
 - New US CABs and new UK CABs will have to follow application process established by each Party.
 - Well established for designation/recognition to the US (same process)
 - Under development for designations/recognitions to the UK (new process)

UK Scheme Differences: General

Topic/Element	US-EU MRA	US-UK MRA
Type of CAB	Notified Body	Approved Body
Database of recognized CABS	NANDO	UKMCAB US CABS are tagged as Approved Bodies and also as Third Country Bodies.
CAB Deliverable	NBs issued an EU Type Examination Certificate (EU TEC)	UK ABs issue a UK Type Examination Certificate (UK TEC)
Supports Manufacturer's DOC and use of the following marking	CE mark for products being placed on the market in the EU, including Northern Ireland (NI).	UKCA mark for products being placed on the market in Great Britain (England, Scotland, Wales). See Using the UKCA mark from 1 January 2021 Note 1: The UKCA mark is not valid in Northern Ireland. NI will continue to use the CE mark except as noted below. Note 2: The new UK (NI) mark is only if a UK Approved Body <u>located in the UK</u> does the conformity assessment for a product being placed on the market in NI (but not EU).

UK Scheme Differences: Presumption of Conformity

Topic/Element	US-EU MRA	US-UK MRA
Standards that Provide presumption of conformity	Harmonized Standards published in the OJEU for EU Member States, including Northern Ireland (NI)	UK “ Designated ” standards for Great Britain (England, Scotland, Wales) About UK designated standards https://www.gov.uk/guidance/designated-standards Radio specific designated standards https://www.gov.uk/government/publications/designated-standards-radio-equipment EMC specific designated standards https://www.gov.uk/government/publications/designated-standards-emc Low voltage specific designated standards https://www.gov.uk/government/publications/designated-standards-low-voltage

UK Scheme Differences: Radio Equipment

RADIO		
Topic/Element	US-EU MRA	US-UK MRA
Radio - Applicable Legislation	Radio Equipment Directive (RED) 2014/53/EU	<p>UK Radio Equipment Regulations (SI 2017/1206) - RER</p> <p><i>[This is the transposition of the RED but numbering of clauses is different]</i></p> <p>See also The Product Safety and Metrology etc. (Amendment etc.) (EU Exit) Regulations 2019 - UK Statutory Instruments 2019 No. 696 SCHEDULE 29</p> <p><i>The above Schedule 29 identifies all changes from the RED text that shall apply.</i></p>
Radio - Module B Reference	Annex III	Schedule 3
Restrictions of USE	RED Article 10 (10) EU Guidance	UK Guidance on Regulation 14: Information to be included where there are restrictions on putting into service or requirements for authorization of use - December 2020

UK Scheme Differences: Coordination Group

Topic/Element	US-EU MRA	US-UK MRA
<u>CAB Coordination Group</u>	<p>REDCA (paid membership required) to meet RED Article 26.11</p> <p>Reflector for REDCA discussions</p> <p>www.redca.eu</p>	<p>This is under development.</p> <p>No formal group yet to meet RER Schedule 8 (17)</p> <p>Informal Reflector created for UK discussions – for UKMCAB listed Approved Bodies only.</p> <p>Radio Equipment Regulation (RER) Approved Bodies (AB) website - Under Development</p>

UK Scheme Differences: EMC Regulations

EMC		
Topic/Element	US-EU MRA	US-UK MRA
EMC - Applicable Legislation	Electromagnetic Compatibility (EMC) Directive 2014/30/EU	UK EMC Regulations (SI 2016/1091) See also The Product Safety and Metrology etc. (Amendment etc.) (EU Exit) Regulations 2019 UK Statutory Instruments 2019 No. 696 SCHEDULE 20 The above Schedule 20 identifies all the changes from the EMCD text that shall apply.
EMC - Module B reference	Annex III, Part A,	Schedule 3, Part 1

UK Scheme Differences – Coordination Group

EMC		
Topic/Element	US-EU MRA	US-UK MRA
CAB Coordination Group – CAB participation required	<p>EUANB to meet EMCD Article 24.11</p> <p>All EMCD NBs become a member of this group. There is no cost to join.</p> <p>Reflector for technical discussions</p>	<p>Under Development</p> <p>No formal group yet to meet EMC Regulations Schedule 5 (18)</p>

UKMCAB – Locating UK Approved Bodies

UK Market Conformity Assessment Bodies

From: [Department for Business, Energy & Industrial Strategy](#)

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radio

15 bodies

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Registered as × Approved body

Based in × United States of America

Concerned with × Radio equipment

^ Body type

1 selected

- User inspectorate
- Recognised third-party organisation
- Third country body
- Notified body (NI)

ACB, Inc.

ACB, Inc.

Body type: Approved body and 1 others Registered office location: United States of America

Legislative area: Electromagnetic compatibility and 1 others

<https://www.gov.uk/uk-market-conformity-assessment-bodies>

Review and Closing

- We covered several topics today:
 - Basic concepts of telecom MRAs
 - The US system for MRA implementation
 - How the accreditation world has responded to the COVID crisis through implementation of remote assessment tools to enable the continued accreditation of CABs and continued operation of telecom MRAs
 - How the new UK Approved Body scheme is developing – with some emphasis specifically on how some of the details are diverging from the EU Notified Body system

Thank you for your attention.

Thank you to MIC for this opportunity to present – it is a great honor.

I look forward to hearing and learning from our next speakers.

Best wishes for a very successful workshop.