



Accreditation and Designation of CABs – Japan, EU, USA

Japan MRA Workshop
March 4, 2015

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Topics

- Introduction: NIST and MRAs
- Japan: Accreditation and designation of U.S. **Registered Certification Bodies (RCBs)**
- Europe: Accreditation and notification of U.S. **Notified Bodies (NBs)**
- United States: Test data acceptance by **Telecommunication Certification Bodies (TCBs)** – phase out of FCC 2.948 listed labs

NIST

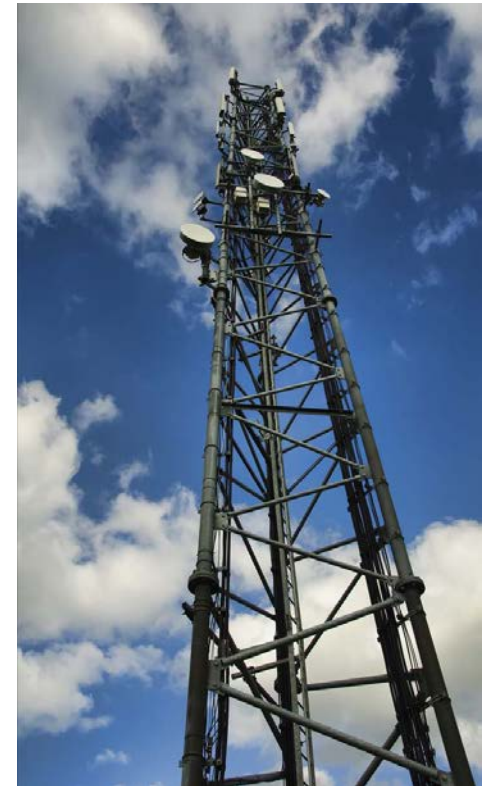


- Part of the U.S. Department of Commerce
- Advance measurement science, standards, and technology
- Promote innovation and industrial competitiveness
- Support research and programs to help industry



NIST

- Designating Authority for Telecom MRAs:
 - Designates U.S. CABS to MRA partners
 - Monitors recognized U.S. CABS
 - Helps facilitate communications between U.S. CABS and MRA partners
- Supports the Federal Communications Commission (FCC)
 - Designates U.S. TCBs to the FCC



Japan-US



MRA & Arrangement

Certification Bodies - RCBs

○ Covered under **Japan-US MRA**

- A1/A2: Terminal Equipment
- B1/B2/B3: Radio Equipment
- To be an RCB, the CAB must have capability to certify all classes of equipment covered under a scope (B1, for example)

Laboratories

○ Covered under separate exchange of letters between the U.S. and Japan – known as the **EMC Arrangement**

- EMI from ITE
- VCCI accepts test reports issued by accredited U.S. labs that are members of VCCI and have registered their test facilities with VCCI

Japan-US MRA Timeline

Timeline and Status

February 2007 – Japan-US MRA Signed

November 2010 – NIST begins to accept U.S. CB applications

March 2011 – First 2 RCBs from U.S. are recognized by MIC

Today - 5 U.S. RCBs are recognized by MIC

American Certification Body, Inc. (ACB, Inc.)
Bay Area Compliance Laboratories, Corp. (BACL)
MiCOM Labs
SIEMIC, Inc.
UL Verification Services, Inc.

RCB – NIST Criteria for Designation

- NIST Criteria for Designation
 - Published Document: *Criteria for Designation of U.S. Conformity Assessment Bodies under the U.S.-Japan Mutual Recognition Agreement* – Oct. 1 2012 (V2)
- Covers
 - Scope of the MRA
 - Applicable Laws and Ordinances
 - Test Methods Notified by MIC
 - Requirements for U.S. CAB Designation
 - Application Checklist
 - Excerpts of Information on Affidavit
 - Excerpts on Technical and Educational Requirements for the Radio Law
 - Information on Additional Resources

RCBs – Accreditation Requirements

The U.S. RCB must

- Be accredited to ISO/IEC Guide 65 (transition to ISO/IEC 17065 by September 15, 2015) for one or more US-Japan MRA scopes and must:
 - Have expert knowledge in Japan's laws, ordinances, technical regulations, and administrative requirements
 - Meet educational and experience requirements for personnel
 - Demonstrate the capability to access MIC requirements and obtain English translations

RCBs - Laboratory & Test Method Requirements

The U.S. RCB must

- Have an ISO/IEC 17025 lab that is accredited for
 - For relevant MIC test methods; or
 - For test methods that are equal to or surpass the MIC test methods
 - Procedures for determining equivalency
 - Maintain records of equivalency determination
- Contractual arrangements with other labs are acceptable
- Maintain procedures for acceptance of test data from other labs

RCBs – Designation & Recognition Processes

- NIST **reviews** all documents submitted and prepares
 - Designation letter
 - Nomination form
 - Joint Committee Decision form
- NIST **designates** CAB – all documents are sent to MOFA & MIC
- MIC **recognizes** CAB as RCB and notifies NIST
 - Publication in Gazette
 - RCB number assigned
- NIST confirms recognition to RCB
- NIST provides the Excel Spreadsheet for periodic reporting of certified products
- RCBs must address any market surveillance issues
- RCBs get reassessed every two years

US-EU MRA



Current U.S. Notified Bodies for EU

- 23 U.S. CABs have Notified Body status for the EMC Directive (2001/108/EC)
 - Status expires on April 20, 2016
 - Must be re-notified to revised **EMC Directive (2014/30/EU)**
 - No mandatory use of an NB by a manufacturer
- 18 U.S. CABs have Notified Body status for the R&TTE Directive
 - Status expires on June 13, 2016
 - Must be re-notified to new **Radio Equipment Directive (2014/53/EU)**
 - Mandatory use of an NB by the manufacturer if harmonized standards are not used in full for radio essential requirements



Role of the Notified Body

- Under Module B, the Notified Body will
 - Examine a manufacturer's technical documentation and supporting evidence
 - Verify and attest that the technical product design meets the relevant legislative requirements
- The Notified Body then
 - Writes an evaluation report
 - Issues an EU-Type Examination Certificate

Main Change for Notification Process

- Formal accreditation is now the *preferred route* for demonstrating NB competence
 - US NBs must obtain accreditation for their NB activities
- EA-2/17, *EA Document on Accreditation for Notification Purposes*
- *The EU Blue Guide* states that the basic standards for Module B are:
 - ISO/IEC 17065 (Certification Bodies)
 - ISO/IEC 17020 (Inspection Bodies)



Steps Remaining in the Transition

- NIST publishes requirements for re-notification
 - Anticipated by April 15, 2015
- Assessors complete preliminary training
 - Anticipated by June 1, 2015
- Accreditation Bodies begin assessing NBs
 - Starting in June, 2015 - ongoing
- Notified Bodies apply to NIST for re-notification
 - By January/February 2016
- NIST re-notifies NBs to the Commission
 - By March (EMC)/April (RED) 2016
- European Commission publishes lists of NBs
 - By April 20, 2016 (EMC) and June 13, 2016 (RED)

FCC – Phase out of 2.948 Listed Labs





FCC Report and Order 14-208

- Released December 30, 2014
- Revisions to FCC radiofrequency (RF) equipment authorization program
- Review details of document for all changes
- Specific topic highlighted in this presentation
 - Test Data Acceptance by TCBs

Current Rules for TCB Acceptance of Test Data

Certified Devices Covered under Parts 15 and 18	All Other Devices Subject to Certification
<p data-bbox="305 602 1078 648">“Accredited and FCC Recognized” Labs</p> <p data-bbox="305 659 1112 928">These are labs (1) <u>accredited</u> by an accreditation body recognized by the FCC -Domestic ABs - evaluated by the FCC -ABs in other countries – only if there is a Telecom MRA with the US</p>	<p data-bbox="1188 602 1510 648">Competent Labs</p> <p data-bbox="1188 659 1761 762">TCB accepts responsibility for quality of data</p>
<p data-bbox="305 1065 680 1110">“2.948 Listed” Labs</p> <p data-bbox="305 1122 1155 1219">- Measurement facilities are registered with FCC</p>	

Future Rules for TCB Acceptance of Test Data

All Devices Subject to Certification

“Accredited and FCC Recognized” Labs

These are labs accredited by an accreditation body recognized by the FCC.

- Domestic ABs that have been evaluated by the FCC
- ABs in countries with a Telecom MRA or other arrangement

~~Competent Labs~~

~~TCB accepts responsibility for quality of data~~

~~“2.948 Listed” Labs~~

- ~~- Measurement facilities are registered with FCC~~

Transition Period for 2.948 Listed Labs

- *The Commission will no longer accept applications for § 2.948 test site listing as of [effective date of the rules]*.*
- *Laboratories that are listed by the Commission under the § 2.948 process will remain listed until the sooner of their expiration date or [one year from the effective date of the rules].**
- *Laboratories with an expiration date before [one year from the effective date of the rules]* may request the Commission to extend their expiration date to [one year from the effective date of the rules].*
 - *Labs that have maintained 2.948 listing until one year after the effective date of the rules may continue to submit test data in support of certification applications for three additional month*
 - *All testing must be completed within one year of the effective date of the rules*

**Effective date of the rules is 30 days after publication in the United States Federal Register.*

Impact to Stakeholders

- 2,948 listed labs that want their test data to be accepted by TCBs in the future must get accredited and obtain FCC recognition
 - Note that the FCC does not currently recognize the accreditations issued by ABs in non-Telecom MRA countries (such as China)
- Manufacturers must, in the future, use “Accredited and FCC Recognized” labs for all device/equipment testing prior to submittal of certification application(s) to TCBs
- TCBs must, in the future, only accept test data from “Accredited and FCC Recognized” labs
- “Accredited and FCC Recognized” labs should consider getting their Scope of Accreditation expanded to include testing for applicable devices (once the FCC defines the test firm scope)



Questions?

Thank you.

Contact Information

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Questions about MRAs

Please send your request to mra@nist.gov