Commentary from a Certification Body

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Background

- iNARTE-Certified EMC Engineer
- Professional Engineer (Virginia)
 - Founder, Washington Laboratories (1989)
 - Founder, American Certification Body (1999)





ACIL







Project Experience

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Over 20,000 projects since 1989

- Wireless Certifications
- NASA
- Raytheon
- US Army, Air Force & Navy
- General Electric
- Westinghouse
- Hughes Network System
- Applied Physics Laboratory
- Exelon
- 35+ Nuclear Power Plants
- Research Universities
- Over 500 individual clients











Presentation for Today 3 Themes

- Services for a booming wireless industry
- Some statistics
- Delivering what the customer needs





Standards and Regulations

- Compatibility and Spectrum Protection
- Health and Safety
- Functional
- Performance





Compatibility & Spectrum Protection

- Regulatory
 - FCC in US
 - ISED in Canada
 - CE Marking in EU
 - MIC Japan



• Country specific





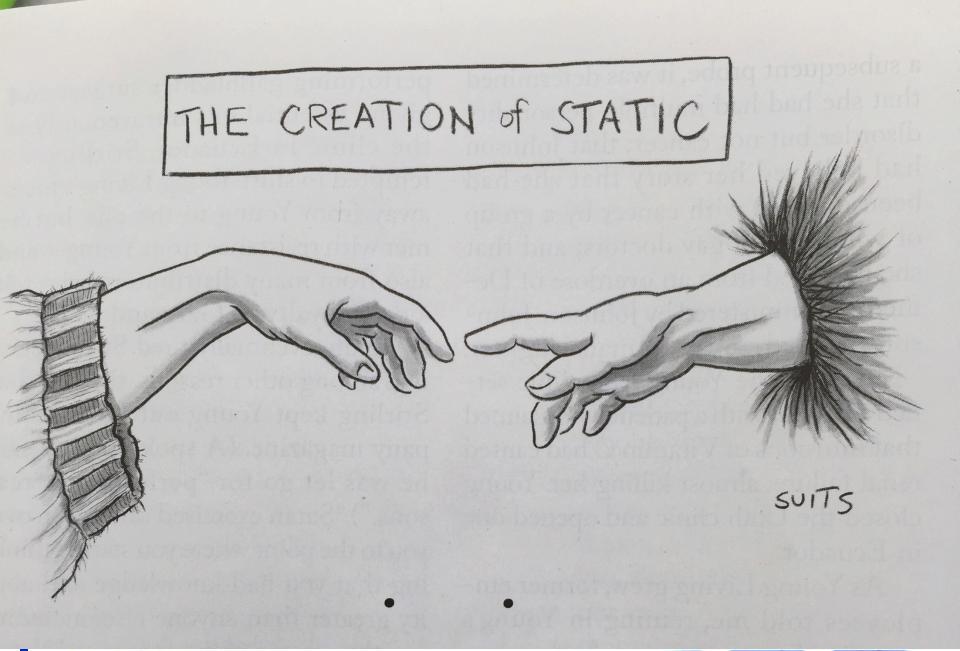


Health & Safety Standards

- IEC: International Electro-technical Commission
- EN: European Norm
- UL: Underwriters Laboratories
- CSA: Canadian Standards







Functional

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- Communications Protocols

 IEEE 802.11, etc
 CTIA
- Size, weight, form and fit
 Role for Inspection Body
 ISO 17020





Toad soup medicine does not work

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A 53-year-old man in Suzhou had to receive emergency medical treatment after drinking soup made from toads. His daughter cooked the soup for

OUT CERTIFICATION RESOURCE

U.S. REGULATORY AUTHORITIES

- Federal Communications Commission (FCC)
 - Control use and protection of Radio Frequency Services for Public



RF Safety Issues Human Exposure - SAR

- ANSI C95.1
- OET 65
- OET 65-C
- FCC Part 1.1037
- FCC Part 2.1091 Mobile Devices
- FCC Part 2.1093 Portable Devices

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• FCC Part 15.247 (b) (4)



Accreditation in Our Industry

- ISO 17065 for Certification Bodies
- ISO 17025 for Laboratory Operations
- Accreditation by third-party accreditors







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Accreditation Bodies

- International Laboratory Accreditation Program (ILAC)
 - Since 1996
 - 66 Accreditation Bodies





Accreditation Process

- Audit
 - Management System
 - Records
 - Calibration
 - Incoming sample control
 - Reports
 - Methods
 - Complaints and Corrective Actions

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Certificate and Scopes



PRODUCT CERTIFICATION

The American National Standards Institute hereby affirms that

ACB, Inc. 6731 Whittier Avenue, Suite C110, McLean, VA 22101, USA

ACCREDITATION ID# 1014

meets the ANSI accreditation program requirements and those set forth in ISO/IEC 17065.2012 Conformity assessment – Requirements for bodies certifying products, processes and services LIST OF CERTIFICATION SCHEME(S)

Telecommunication Certification Bodies (TCBs) Innovation, Science and Economic Development Canada (ISED) – CB-02 Recognition Criteria and Administrative and Operational Requirements Applicable to Certification Bodies (CBs) for the Certification of Radio Apparatus EMC Directive 2014/30/EU - Annex III – Part A (Module B: EU-Type Examination) Radio Equipment Directive (RED) 2014/53/EU - Annex III (Module B: EU-Type Examination) only Criteria and Requirements Applicable to Foreign Testing Laboratories and Certification Bodies Seeking Recognition by OFCA as Conformity Assessment Bodies Ordinance for Enforcement of the Act for Implementation of the Mutual Recognition between Japan and Foreign States in Relation to Results of Conformity Assessment Procedures of Specified Equipment (MIC/METI Ordinance No. 3 of 2001)

for programs within the following

SCOPE OF ACCREDITATION

(Please see following pages)



2019-12-01 VALID THROUGH



ACB, Inc. ACCREDITATION ID# 1014 SCOPE OF ACCREDITATION

GRAVTED 2015 09-23: FCC (A1) Unicensed Radio Frequency Devices FCC (A2) Unicensed Radio Frequency Devices FCC (A3) Unicensed Radio Frequency Devices FCC (B1) Unerested Radio Frequency Devices FCC (B1) Unerested Radio Frequency Devices FCC (B2) Unerested Radio Frequency Devices FCC (B3) Unerested Radio Frequency Devices FCC (B3) Unerested Radio Frequency Devices

GRWITED 2015 09-23: SED Radio Scope 1 – Licence exempt Radio Frequency Devices SED Radio Scope 2 – Licenced Personal Mobile Radio Services SED Radio Scope 3 – Licenced General Weblic and Fland Radio Services SED Radio Scope 5 – Licenced Maritime and Aviation Radia Services SED Radio Scope 5 – Licenced Fland Microwave Radio Services

GRANTED 2016-05-21: EU Radio Equipment Directive (RED) Radio equipment (excluding equipment as stipulated in Article 1.2 and Article 1.3)

GRANTED 2016-06-21: EU Electromagnetic Compatibility (EMC) Directive Electrical and electronic equipment (excluding equipment as stipulated in Article 2.2.)



Testing and Evaluation





EMC Compliance - US

- FCC
 - Applies to
 - Devices that can harm communications
 - Regulates emissions (not immunity)
 - CFR 47
 - Many Rule Parts
 - Radios
 - FCC OET Bulletin 65, Supplement C
 - RF Exposure Levels to Humans (SAR)





EMC Compliance - Canada

- Innovation Science and Economic Development (ISED)
 - ICES-003 unintentional emitters (US Part 15 harmonized)
 - CS03 telecommunications products
 - RSS-210 non-licensed RF products
 - RSS-119 Land Mobile and Fixed Radio





Two Routes to Authorization Recent Changes

sDoC and Certification

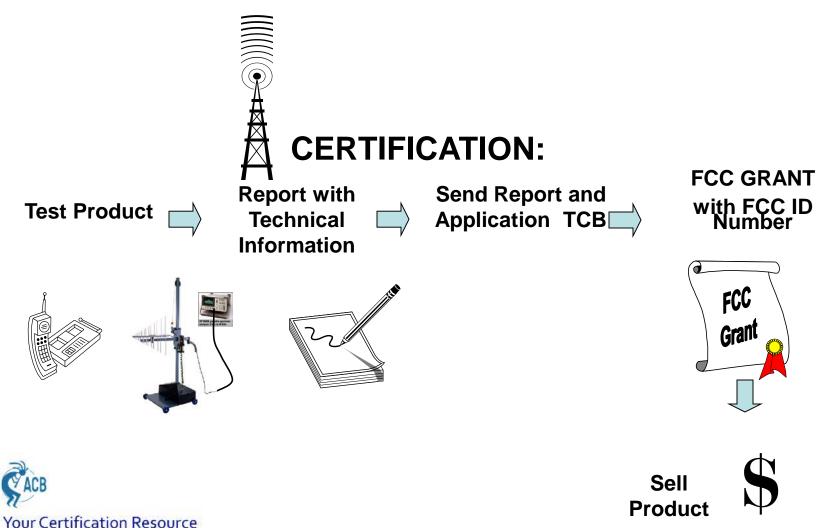
- 1. sDoC: Supplier Declaration of Conformity
 Testing done by any lab, <u>regardless of accreditation</u>
- 2. Certification
 - Testing at approved laboratory
 - TCB Certifies device with FCC Guidance





RADIO TRANSMITTERS

FCC ID NXXXXnnnnnnnnnnnn



TCB

GRANT OF EQUIPMENT AUTHORIZATION

Certification Issued Under the Authority of the Federal Communications Commission By:

> American TCB, Inc. 6731 Whittier Avenue Suite C110 McLean, VA 22101

Date of Grant: 12/01/2009

Application Dated: 11/30/2009

ZTE Corporation ZTE Plaza, Hi-tech Park, Nanshan District, Shenzhen, Guangdong, 518057 China

Attention: Royce Wang, Product Certification Manager

FCC

NOT TRANSFERABLE

EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is VALID ONLY for the equipment identified hereon for use under the Commission's Rules and Regulations listed below.

Q78-VDF545 IDENTIFIER:

Name of Grantee: ZTE Corporation

Equipment Class: PCS Licensed Transmitter held to ear Notes: GSM Quad_band digital mobile phone

		Frequency	Output	Frequency	Emission	
<u>Grant Notes</u>	FCC Rule Parts	Range (MHZ)	Watts	Tolerance	Designator	
BC	22H	824.2 - 848.8	0.805	0.1 PM	300KGXW	
💦 вс	24E	1850.2 - 1909.8	1.18	0.1 PM	300KGXW	
Y A						~
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Your Certification Resource

TCB

Major Regional Requirements Electronic Devices

- US: FCC, Product Safety, Environmental – Toys: Consumer Product Safety Commission
- Europe: CE Marking "easy"
- Brazil, China:
 - Compulsory testing in-country for telecom
- MRA Countries (Mutual Recognition)

Many Changes in ~20 Years

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World View: 1990

 Small and Medium Size Enterprise (SME's) World View







NOW: 2017

• SME's World View







Wireless – Some Statistics







FCC Certification

• All Wireless Devices are certified by Telecommunications Certification Bodies

TCBs

- Private companies
- About 30 in the world
- ACB Issued 2700 Original Grants in past year

• ~18%





TCB Program

- Post-market surveillance
 - 5% of all devices must be tested by TCB

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- FCC performs market Surveillance
- Example:
 - Big tablet manufacturer
 - Complaint by competitor
 - FCC tested the device
 - Power over the limit
 - Compliance program required



FCC Certifications: 2004-2014

Certifications (Original and Changes to Devices)

Region	2004	2014	Growth Factor
N. America	2988	15145	5.1
Europe	479	3034	6.3
Asia	3163	14800	4.7

5X Growth Rate Globally!





FCC Certifications: 2004-2014

Asia:

Asia	2004	2014	Growth Factor
Japan	417	816	2.0
Taiwan	1238	3105	2.5
South Korea	578	635	1.1
China	327	8463	25.9
Hong Kong	603	1781	3.0
ALL ASIA	3163	14800	4.7





Market Distribution Number of <u>Devices Certified in 2015</u>

Certifications by Grantee

USA	6815	35.1%
China	5839	30.1%
Taiwan	1604	8.3%
EU	1399	7.2%
All Else	1384	7.1%
Hong Kong	1175	6.1%
South Korea	602	3.1%
Japan	574	3.0%

Total

19392





Modular Transmitters

 Make it easier to put modular transmitters in products

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- Faster for products to reach market
- IoT
 - Integrators' challenges



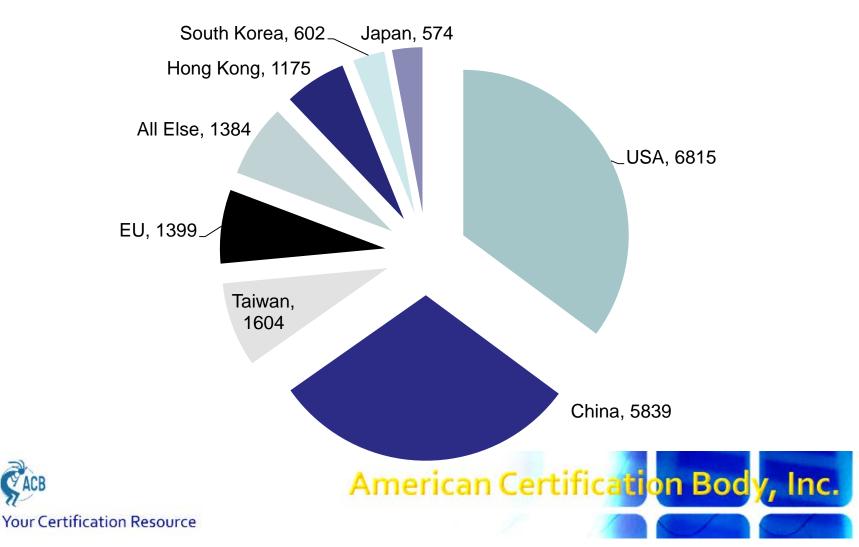
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Market Distribution Global

Source of Grantees for Original FCC IDs



Market Distribution Asia

Asia Certifications



ChinaNon-China





MRAs have been good to us

- A mutual recognition agreement (MRA) is an international agreement by which two or more countries/economies agree to recognize each other's conformity assessments
 - Can also be used for other purposes (accreditation, law enforcement, security, finance, standards)
- To facilitate TRADE

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US MRAs

- US-EU
- US-EAA EFTA (non EU Europe)
- APEC TEL MRA
 - Multi-Lateral (multiple countries)
 - Signed in 1998
- US-Japan MRA
- US-Israel MRA
- CITEL (South America, not operational)

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Testing Laboratories

- Listed and Accredited Labs by Country
 - May be same company (with different test locations)
 - FCC Test Lab Resources Before July 13, 2016 (at least 595)

FCC Status	US	China	Taiwan	Korea	Japan	Germany	UK	Other
2.948 Listed	95	150	68	39	99	31	19	94
Accredited	116	0	46	32	66	10	9	49





Testing Laboratories in non-MRA Countries

- Test Firms in non MRA countries
 - New initiative recognizes labs in non-MRA countries
 - FCC recognized US Test Firm Accreditation bodies (TFAB's) are permitted to designate domestic accredited test firms to the FCC





Supplier's Declaration of Conformity

- Combine two separate product approval programs – Declaration of Conformity and Verification – into one product selfapproval program:
 - Verification and DoC are used for equipment that has a strong record of compliance and for which there is minimal risk of harmful interference
 - FCC Logo
 - Labeling of products





MRA Definitions

- Phase 1: Confidence Building
 Accept Test Reports
- Phase 2: Full Implementation
 - Can Certify
- Conformity Assessment Body (CAB)
 - Recognized to perform "Certification" activity
 - TCB in US
 - Notified Body in EU



US APEC TEL MRAs

Economy	Regulatory Authority	Phase I	Phase II
Australia	Australian Communications Media Authority (ACMA) 🚱	Yes	
Canada	Industry Canada (IC) &	Yes	Yes
Chinese Taipei	The Bureau of Standards, Metrology and Inspection (BSMI) &	Yes	
Chinese Taipei	National Communications Commission (NCC) 🖉	Yes	
Hong Kong	Office of Communications Authority (OFCA) 🗟	Yes	Yes
Republic of Korea	Radio Research Agency (RRA) 🚱	Yes	
Singapore	Infocomm Development Authority of Singapore (IDA) 🗟	Yes	Yes
Vietnam	Ministry of Information and Communication (MIC) 🗗	Yes	

FCC Rule changes essentially eliminated incentives for some economies to participate American Certification Body, Inc.

Your Certification Resource

Changes

- Benefits to consumers
- Accessibility to communications
- "Always on"
- Security and infrastructure isses
- More to come





Services Needed?



Worldwide System for Conformity Testing and Certification of Electrical Equipment (IECEE)

Definition of Product Consultancy, Independence and Impartiality for Certification Bodies and Testing Laboratories







Product Consultancy

- We are asked for solutions to CA issues constantly
- ISO 17025 and ISO 17065 preclude "consultancy" as a risk to impartiality
- This situation creates inherent conflict

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- Serve customer?
- Effectively compete
- Feed my people



This happens frequently

- 1. It is not a unique method of solving a problem but rather one of a number of well-known solutions.
- 2. It is not based on someone else's proprietary information, such as a unique construction seen in a product of another customer.
- 3. The same type of advice is given to all customers, as may be applicable. There may be a printed list of alternative methods of overcoming common problems; and, such a list is provided to all customers.
- 4. The customer must understand that it is the customer who is responsible for choosing any specific design and ensuring that it complies with the requirements.

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Tricky Issue

- It is particularly important for an NCB or CBTL not to suggest actual design changes that might bring the product in compliance with the IEC Standard's requirements.
- If an NCB or CBTL/ACTL makes an error in suggesting a change when, in fact, by test it could prove to be unacceptable, a gross mistake has been made and the NCB or CBTL/ACTL can be put in an uncomfortable position.
- It is not the NCB's or CBTL's/ACTLs job to redesign products to comply with the IEC Standard's requirements (i.e. "commercial design consultancy").





"Not Consultancy"

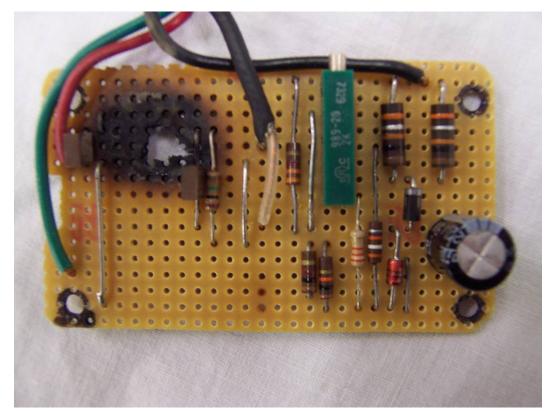
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Example: Resistor Gets a Little Hot







Alternative Approaches

- Either a printed wiring board with a temperature rating according to the test results needs to be provided, or
- the resistor should be sufficiently elevated from the printed wiring board to ensure that the adhesive bond between the conductor foils and base material is not subjected to this temperature. American Certification Bod

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An Example for Suggesting Appropriate Alternatives

- Either a printed wiring board with a temperature rating according to the test results needs to be provided, or
- the resistor should be sufficiently elevated from the printed wiring board to ensure that the adhesive bond between the conductor foils and base material is not subjected to this temperature.





Pragmatic Approach

- Balance between supporting client product development and impartiality
- Must have internal controls
- Transparency in providing solutions





Questions?

- Contact:
 - mikev@acbcert.com

www.acbcert.com



