



April 11, 2025

**Re: Federal Communications Commission GN Docket No. 25-133**

The American National Standards Institute (ANSI) is pleased to offer comments to the Federal Communications Commission (FCC) in response to its Public Notice released on March 12, 2025, seeking input on identifying FCC rules, regulations, and guidance documents that impose unnecessary regulatory burdens.

ANSI supports the FCC's efforts to identify priority policy actions to ensure that the FCC achieves meaningful burden reduction while continuing to meet statutory obligations to assure that all Americans have access to "rapid, efficient, nationwide, and worldwide wire and radio communication services." In this context, effective, voluntary standards and conformity assessment solutions are vital to advancing rapidly evolving, cross-cutting technology areas like advanced communications while minimizing regulatory burden.

In the process of the Commission considering specific rules for revision or withdrawal, ANSI recommends that the FCC look to certain of its existing regulatory and voluntary programs that leverage private sector partnerships to reduce government costs, increase efficiency, better address marketplace and technological challenges, and lower barriers to market entry. Such programs are adaptable to technology and market developments and can serve as a bridge to increased reliance on private sector self-regulatory actions. These programs operate through public-private collaboration, with FCC oversight:

- **FCC's Equipment Authorization Program:** The following procedures are recognized by the FCC and foreign regulators and include FCC reliance on private sector accreditation bodies to accredit:
  - laboratories that perform testing of telecommunications equipment subject to FCC rules,<sup>1</sup> and
  - telecommunications certification bodies (TCBs) that issue equipment authorizations for RF devices with the greatest potential to cause harmful interference to radio services.<sup>2</sup>
- **FCC's Cyber Trust Mark program,**<sup>3</sup> a voluntary cybersecurity labeling program for wireless consumer IoT products. The program builds on significant public and private sector work on IoT cybersecurity and will rely on public-private collaboration going forward.

The FCC's equipment authorization rules incorporate by reference standards that have been developed by an ANSI-accredited standards development organization, as well as by the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC).<sup>4</sup> The Cyber Trust Mark

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<sup>1</sup> <https://www.fcc.gov/engineering-technology/laboratory-division/general/equipment-authorization>

<sup>2</sup> <https://www.fcc.gov/general/equipment-authorization-procedures>

<sup>3</sup> <https://www.fcc.gov/CyberTrustMark>

<sup>4</sup> ANSI is the official U.S. representative to ISO, and through its U.S. National Committee, the IEC.

program leverages private sector standards that are under development currently by interested and affected stakeholders.

Many voluntary standards are appropriate or adaptable for the Federal government's purposes. The use of such standards, whenever practicable and appropriate, is intended to:

- Eliminate the cost to the Federal government of developing its own standards and decrease the cost of goods procured and the burden of complying with agency regulation
- Provide incentives and opportunities to establish standards that serve national needs, encouraging long-term growth for U.S. enterprises and promoting efficiency, economic competition, and trade
- Further the reliance upon private sector expertise to supply the Federal government with cost-efficient goods and services

These benefits are outlined in Office of Management and Budget (OMB) Circular A-119, *Federal Participation in the Development and use of Voluntary Consensus Standards and in Conformity Assessment Activities*. This Circular has guided federal agency implementation of the National Technology Transfer and Advancement Act of 1995 (NTTAA) for more than two decades. The NTTAA directs federal agencies to look to private voluntary standards in lieu of developing government unique standards, and also encourages reliance on private sector conformity assessment programs. Through this public-private partnership, the United States can respond most effectively to the strategic needs of the nation on both domestic and international fronts.

ANSI stands ready to work with the FCC to identify private sector standards and conformity assessment resources to support the FCC's deregulatory initiatives.

### **About ANSI**

As coordinator of the U.S. private-sector-led standardization system, ANSI's mission is to enhance both the global competitiveness of U.S. business and the U.S. quality of life by promoting and facilitating voluntary consensus standards and conformity assessment systems, and safeguarding their integrity.

ANSI is a federation whose members are government agencies, trade associations, standards developing organizations, professional societies, companies, academic and international bodies, and consumer organizations. Through our membership, ANSI represents the interests of more than 270,000 companies and organizations and 30 million professionals worldwide.

ANSI is the sole U.S. representative to the International Organization for Standardization (ISO), and, through the U.S. National Committee (USNC), to the International Electrotechnical Commission (IEC). ANSI promotes the use of U.S. standards internationally, advocates U.S. policy and technical positions in international and regional standards organizations, and encourages the adoption of international standards as national standards where they meet the needs of the user community.

ANSI is active in a number of public- and private-sector partnership activities across the globe that provide U.S. industry engagement opportunities with emerging economies on standards, trade, infrastructure, and good regulatory practices.

ANSI also initiates standardization collaboratives, partnerships, and workshops in areas vital to U.S. interests and priorities—often in cutting-edge industries and emerging technology sectors.

For more information, visit [www.ansi.org](http://www.ansi.org).

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