

*International Workshop On Mutual Recognition
Agreement For R&TTE in Tokyo 2006*

**ANSI's Experience in Accrediting Telecommunication
Certification Bodies in the USA in accordance with
FCC, IC and IDA Requirements**

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Mission

To enhance the global competitiveness of U.S. business and the American quality of life by promoting and facilitating voluntary consensus standards and conformity assessment systems and ensuring their integrity.

A Private- and Public-Sector Partnership Since 1918

ANSI is not a government agency or a standards developer.





A Federation of members representing . . .

- Academia
- Individuals
- Government
- Manufacturing
- Trade Associations
- Professional Societies
- Service Organizations
- Standards Developers
- Consumer and Labor Interests
- and many more

Bringing the Private- & Public-Sectors Together

History of TCB Program

- FCC adopts rules for implementing Telecommunications Certification Bodies - 1999
- Based on ISO/IEC Guide 65 accreditation criteria
- Accreditation of Telecommunications Certification Bodies for:
 - **FCC** – USA Requirements – 2000
 - **IC** – Canadian Requirements – 2003
 - **IDA** – Singapore Requirements – 2005

ANSI's Recognition

- **NIST/NVCASE**

- ➔ **Telecommunication Certification Bodies**

- ***ISO/IEC 17011*** – **Conformity Assessment** – *General Requirements for accreditation bodies accrediting conformity assessment bodies*
 - ***NVCASE Program Handbook*** – *Procedures for Obtaining NIST Recognition as an Accrerator*

Top Level ACC Documents

- **ANSI-ACP-CA-001:** Policy and Criteria for Accreditation of Certification Programs
- **ANSI-ACP-CA-002:** Manual of Operations for Accreditation of Certification Programs
- **ANSI-ACP-CA-003:** Operating Procedures of the Accreditation Committee

“In compliance with ISO/IEC 17011”

ANSI'S ROLE in the APEC TEL MRA

Accredit Telecommunication Certification Bodies in accordance with ISO/IEC Guide 65 - *General Requirements for Bodies Operating Product Certification Systems*

- *Federal Communications Commission Requirements*
- *Industry Canada Requirements*
- *IDA Singapore*
- *etc.*

Accreditation Process for Product Certifier

- Preliminary Letter of Application
- Application
- Preparation for Assessment
- Initial Assessment
- Assessment Report
- Accreditation Committee Renders Decision
- 2-year cycle -- Surveillance & Reassessment

Accreditation Committee (ACC)

■ Membership

- Conformity Assessment **6**
- Industry **5**
- Government **3**
- At large **2**

Function of the Committee

- Render decision on accreditation
- Develop policies and procedures
- Review the process of evaluation of applicant
- Monitor Accreditation Program
- Complaints and Appeals

Accreditation Decisions

- Resolution of Non-Conformities
- Evaluation Task Group Report
- Accreditation Committee Renders Decision
- Appeal Decision
- Announcement of Accreditation
- Surveillance (Continuing Accreditation)

ANSI Accredited TCBs

- American TCB, Inc.
- Bay Area Compliance Laboratory Corporation
- CKC Certification Services
- Communications Certification Laboratory
- Compatible Electronics, Inc.
- Compliance Certification Services
- Curtis-Straus LLC
- Elite Electronic Engineering, Inc.
- Elliott Laboratories, Inc.
- Intertek Testing Services, NA Inc.
- MET Laboratories, Inc
- Northwest EMC, Inc.
- PCTEST Engineering Laboratory, Inc.
- Timco Engineering, Inc.
- TUV Rheinland of North America, Inc.
- Ultratech Engineering Labs Inc.
- Underwriters Laboratories, Inc.

The Assessment

- An Assessment Team is suggested by ANSI and accepted by the TCB
- The Assessment Team is typically composed of a Lead Assessor and a Technical Expert
- The Lead Assessor plans the assessment and primarily reviews the elements of ISO/IEC Guide 65
- The Technical Expert reviews the technical aspects of the TCB within the context of ISO/IEC Guide 65 and the Regulatory Body requirements
- Some elements of ISO/IEC Guide 65 are common to the areas assessed by the Lead Assessor and the Technical Expert

Review documents prior to on-site visit

- Quality Manual
- Organization Chart
- Job Descriptions and Qualifications
- Subcontracts or Contract Employees
- Evaluation and Certification Process Procedures
- Surveillance Procedures

Overview of quality and product evaluation systems

- × Review the facilities
- × Briefly review the quality system
- × Get an overview of the application process

Specific Areas Assessed by the Technical Expert

- The following slides discuss the areas of the assessment that are primarily reviewed by the Technical Expert
- The numbers and titles of the slides correspond to the clauses of ISO/IEC Guide 65
- The asterisk indicates these clauses are not assessed during a surveillance assessment

4.2 (f) & (j) Organization *

- Review processes for separation of testing, evaluation and decision on certification
- Review training and personnel files
- Along with the assessment of clause 5, review expert knowledge of technical evaluators

4.3 Operations

- Assess the application processing system in detail
- How do applicants gain access to certification information
- How does the applicant enter data into the TCB system
- Follow the flow of the application through the evaluation process
- Review the TCB's associated laboratory's ISO/IEC 17025 scopes

4.4 Subcontracting

- Does the TCB subcontract any of its functions
- Does the TCB use contract employees
- Review contracts to ensure they meet the requirements of ISO/IEC Guide 65 and the regulatory bodies

*4.6 Conditions and procedures for granting... **

- ◆ These requirements are specific to each regulatory body
- ◆ Ensure that the TCB has procedures that take into account the differences of the regulatory bodies

4.8 *Documentation* *

- Review the information that the TCB provides to prospective applicants regarding their certification system
 - How to apply
 - Discussion of the scope of products that they can certify
 - Information on each regulatory body requirements within their scope
 - Review the availability of application form

4.9 Records

- Records are usually assessed during the review of other clauses of ISO/IEC Guide 65
- Ensure that they have implemented the record retention requirements for each regulatory body within their certification scope

5.0 Certification body personnel

There are three major areas that are assessed

- Personnel and training files to assess minimum qualifications and regularity body training requirements
- Knowledge of regulatory bodies schemes
 - Interviews with evaluators and certifiers
 - Documentation of performance - 70% is acceptable

5.0 Certification body personnel - continued

- Laboratory demonstration of evaluator's compliance testing ability
 - The FCC requires that the evaluators be capable of performing core laboratory tests
 - During the assessment each evaluator is asked to perform some elements of core compliance tests
 - We have used a device of opportunity in the past - not always available
 - More recently we have provided a device to test

5.0 Certification body personnel - continued - the test device

- Pulsed transmitter with specific ON and OFF times
- Duty cycle requirement for average limit
- Part 15.231(e) device
- Field strength measurement of fundamental
- Occupied bandwidth



*6.0 Changes in the certification requirements **

- Typically these changes in certification requirements are the result of regulatory body actions
- Check to see that these changes are reflected in the TCB's certification system

*8.0 Application for certification **

- ISO/IEC Guide 65 has specific requirement for the application
- Each regulatory body has unique regulations that in many cases requires different information to be filed with the TCB

9.0 Preparation for evaluation

- Review the TCB's working documents
 - Do they have processes for providing scheme documents or other information to the evaluators
 - Do they have a process for ensure that these documents or other information are current
 - IC requirement are all on their web site
 - IDA requirements are likewise on their web site
 - FCC requirements are not all in one place

10.0 Evaluation

- This is another very critical element in the certification process as indicated by the focus given to this element by the regulatory bodies
 - Review the evaluation process
 - Review several application packages - more or less depending on the number of scopes and evaluators that need to be assessed
 - Look for systemic problems that indicates corrective action is needed

11.0 Evaluation report

- The evaluation report was originally an area of non-conformance
 - No documented report
 - Inadequate information
 - No recommendation to certify or not to certify
 - Not signed
 - No documentation of interaction with the applicant
 - Checklists were not included

12.0 Decision on Certification

- The decision on certification is a critical function of the certification body
- It must not be subcontracted
- It must be independent of the evaluation function

13.0 Surveillance

- Each regulatory body describes their requirements for post certification product surveillance
- Ensure that the TCB's processes correctly reflect those requirements
- Review several surveillance files to determine if the TCB is correctly implementing these requirements

Common issues - Regulatory Bodies

- ISO/IEC 17025 scopes
- Criteria for acceptance of laboratory test data to document compliance
- Surveillance
 - Number to sample
 - Surveillance period
 - Reporting of results
- Interaction between CB and RB
- Publication of Regulations - effective date

Common issues - Certification Bodies

- Inadequate implementation of RB processes
- Inadequate ISO/IEC 17025 scopes to cover CB scopes
- Inadequate training of CB personnel
- Inadequate access to up-to-date RB regulations
- Inadequate separation of the function of testing, evaluation and the decision on certification

ANSI Accreditation Program

For more information on ANSI accreditation

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Questions?