Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program	)	ET Doc. No. 24-136

Comments of the
Telecommunications Industry Association

I. Introduction

The Telecommunications Industry Association ("TIA") appreciates the opportunity to provide input regarding the Report and Order and Second Further Notice of Proposed Rulemaking ("Second FNPRM") issued by the Federal Communications Commission ("Commission" or "FCC") in the above-captioned proceeding.[1] TIA is a U.S.-based trade association representing more than 400 trusted global manufacturers and vendors of telecommunications equipment. TIA members design, manufacture, and manage the world's digital infrastructure and information communications technology ("ICT") devices. TIA is also a standards-developing organization with a more than 80-year history of developing thousands of technical standards that allow ICT equipment and networks to operate efficiently and effectively. Both TIA and its members have firsthand knowledge of timelines for bringing devices to market and are heavily impacted by changes to the FCC's Equipment Authorization Program ("EAP").

[1] *Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program*, Second Report & Order, Order on Reconsideration, and Second Further Notice of Proposed Rulemaking, ET Doc. No. 24-136 (Apr. 30, 2026).

In the Second FNPRM, the Commission seeks input on a proposal to revoke recognition of testing facilities operating in countries that do not have a reciprocal trade agreement with the United States or are not operating under an existing Mutual Recognition Agreement ("MRA"). If the Commission takes further action that reduces the total number of FCC recognized testing facilities by limiting global testing to MRA countries, it should do so following commercially reasonable timelines and release any analysis the Commission has on hand that would reduce industry uncertainty as to the impacts of this action. Additionally, the Commission should take this opportunity to examine longstanding regulatory streamlining efforts that have been contemplated by the Commission over the years and that would work to alleviate pressure on existing labs and testing facilities. Through a commercially reasonable phased-out approach coupled with further regulatory streamlining, the Commission can proactively act to ensure that testing capacity is not unnecessarily strained and thus avoid significant impacts to ICT device market timelines and consumer costs.

II. Any Action Further Reducing the Existing Global Testing Infrastructure Should Be Done on a Commercially Reasonable Timeline

As the Commission is well aware, the actions taken in this docket thus far have resulted in the reduction of the total number of FCC recognized facilities abroad – a necessary action taken in order to ensure that there were not EAP participants that were owned or operated by foreign adversaries.[2] The last FNPRM raised the idea of broadening this to include revoking FCC recognition of any facilities operating in countries that do not have a MRA or similar trade agreement with the United States, on which this Second FNPRM seeks further comment. We

[2] FNPRM at 16.

understand that the Administration is concerned with the onshoring of domestic testing facilities, and Commission proceedings are being leveraged to explore means to achieve that objective, whether through considering requirements to onshore call centers,[3] pursuing expanded domestic drone and ICT manufacturing,[4] or supporting the development of an expanded domestic testing infrastructure as contemplated in this docket. As a U.S. trade association with membership largely composed of U.S. companies, TIA supports the goal of bringing critical technology functions to the United States.

However, if the Commission proceeds with this proposal and is intent on no longer recognizing TCBs, testing facilities, or labs in countries that do not have an MRA or reciprocal trade agreement, we urge the Commission to do so under a commercially reasonable timeframe. In the FNPRM, the Commission asks for input on what a reasonable transition period would look like, and what timeline the Commission should adopt.[5] We believe that a period of two years after the effective date of any rules adopted in this docket would be commercially reasonable, which is in line with the Commission's own language used in announcing this proceeding. [6]

In terms of how to approach this transition, a staggered two year period based on the existing renewals of FCC accreditations of test labs and TCBs that occur every two years would, provided that no currently recognized entity loses its recognition in fewer than 24 months after the rule's effective date, align with the Commission's existing renewal structure and provide

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[3] *Improving Customer Service and Protecting Consumers through Onshoring*, Notice of Proposed Rulemaking, CG Docket No. 26-52 (Mar. 26, 2026).
[4] *See Protecting Against National Security Threats in Domestic Telecommunications Service,* Public Notice, DA 26-278 (2026); *see also Protecting Against National Security Threats in Domestic Telecommunications Service,* Public Notice, DA 25-1086 (2025).
[5] FNPRM at 71.
[6] *See* News Release, *FCC Looks to Prohibit Electronic Devise Testing Using Labs in Countries Without Reciprocal Agreements* (https://docs.fcc.gov/public/attachments/DOC-421311A1.pdf) (stating "under this proposal, these labs would be phased out over two years after any final rules were adopted and implemented").

sufficient notice for industry. Alternatively, if the Commission elects to set a certain date upon which affected entities would no longer be recognized, we urge the Commission to set a date no sooner than 24 months after the effective date of final rules adopted in this proceeding. This would put manufacturers on notice that any testing contracts they have entered into with facilities in these locations are at risk and would provide industry with a sufficient off-ramp for transitioning to new services with facilities in the United States or a country with a reciprocal agreement.

In addition to a commercially reasonable transition period, we urge the FCC to take additional steps to reduce regulatory uncertainty. Given the changing nature of how the FCC allows TCBs and testing labs to receive FCC authorization, we urge the Commission to release whatever analysis it has on the number of facilities the Commission currently recognizes and how many would be impacted by this final rule. The Commission's Office of Engineering and Technology maintains databases of FCC-recognized facilities,[7] and the Commission has included statistics thus far of laboratories that have lost recognition as a result of this proceeding.[8] Any further analysis of how the current proposal would constrain international testing infrastructure would be helpful to industry as it works to revise its existing testing procedures.

Finally, in adopting final rules in this docket, we continue to urge the Commission to provide additional regulatory certainty by narrowly defining jurisdiction in this proceeding. As we raised in prior comments, adopting a broad definition of whether an entity is subject to the "jurisdiction or direction of a non-Reciprocal Economy"[9] could potentially impact companies

[7] *See e.g.*. Equipment Authorization System Test Firm Search (*available at* https://apps.fcc.gov/oetcf/eas/reports/TestFirmSearch.cfm); *see also* Telecommunications Certification Bodies Search (*available at* https://apps.fcc.gov/oetcf/tcb/reports/TCBSearch.cfm).
[8] FNPRM at 16.
[9] FNPRM at 70.

that simply do business in those countries and could create uncertainty similar to that discussed above with respect to the scope of non-MRA restrictions.[10] We continue to urge the Commission to be judicious in defining jurisdiction, and no entity should have the recognition of its global testing facilities put in question based solely on business ties to a non-reciprocal or non-MRA country. Similarly, as more proceedings continue to focus on determining whether an entity is "subject to the jurisdiction" of another government, we continue to urge the FCC to work with other agencies to ensure a government-wide approach to defining jurisdiction that aligns with existing trade frameworks and Commission precedent in order to promote regulatory certainty.

III. The Commission Should Utilize this Proceeding to Further Streamline and Modernize the Equipment Authorization Program

As the Commission continues to revise the EAP for national security and onshoring concerns, we urge the Commission to utilize this proceeding to further modernize its EAP regulations and FCC resources to alleviate the existing testing burden on manufacturers and facilities. For instance, the Commission could utilize this rulemaking to act on longstanding reforms to the EAP that have been raised to the Commission in prior proceedings. Almost a decade ago the FCC adopted a Report and Order amending the Commission's radiofrequency authorization rules, with the goal of streamlining existing regulatory burdens on testing facilities.[11] While the First Report and Order adopted many welcome reforms to the EAP, it did not act on all of the contemplated proposals raised in the docket that remain pending before the FCC, and instead reserved them for future consideration. Such proposals include reducing the

[10] See e.g. Comments of TIA at 5-6, 24-136 (Aug. 15, 2025).
[11] *Amendment of Parts 0, 1, 2, 15 and 18 of the Commission's Rules regarding Authorization of Radiofrequency Equipment*, First Report and Order, ET Doc. No. 15-170 (July 13, 2017).

total number of lower-emission devices that require lab testing, providing clearer pathways for group certifications (for example, modular transmitters), and expanding the roles of TCBs in the EAP to reduce the burdens on existing testing labs.

Even more recently, TIA urged the Commission to adopt similar reforms to the EAP in response to the Commission's Delete Delete Delete docket last year, such as transparency reforms to the FCC's Knowledge Database ("KDB"), reducing technologies on the Pre-Approval Guidance ("PAG") list, and increasing the use of the Commission's successful Suppliers Declaration of Conformity ("SDoC") process.[12] On the latter, TIA applauds the Commission's willingness to review its past proposals in this proceeding ,which would have drastically curtailed recent reforms and the expanded use of SDoC.[13] The record in this proceeding was resoundingly supportive of SDoC in its current form, and we urge the Commission to continue, if not expand, its use going forward.[14]

The Commission should also take this opportunity to modernize its existing digital databases to be more user-friendly. In particular, the Commission's Equipment Authorization System[15] and Knowledge Database[16] websites are extremely dated and could be improved to enhance usability, including more intuitive navigation and search functionality. Such updates would increase transparency and efficiency for manufacturers and testing entities that rely on these resources to comply with the Commission's rules. Additionally, the Commission should ensure that these critical systems remain operational during any lapse in federal appropriations,

[12] Comments of the Telecommunications Industry Association, GN 25-133; Reply Comments of the Telecommunications Industry Association, GN 25-133.
[13] FNPRM at 61.
[14] *See eg.* Comments of TIA; Comments of the Consumer Technology Association (Aug. 15, 2025).
[15] *Available at* https://apps.fcc.gov/oetcf/eas/index.cfm (last visited June 15, 2026).
[16] *Available at* https://apps.fcc.gov/oetcf/kdb/index.cfm (last visited June 15, 2026).

even if updates are temporarily paused for the during that period, in order to provide continuity and predictability for industry that depends on uninterrupted access to these databases.

By continuing to streamline existing EAP requirements and modernizing its tools, the Commission can act on overdue regulatory reforms that modernize the Commission's rules while reducing the testing demand on facilities, which could result in fewer testing bottlenecks at existing facilities given the potential new constraints on testing infrastructure proposed by the Commission. Absent additional streamlining, the Commission's proposal to restrict recognition of non-MRA testing facilities risks exacerbating existing capacity constraints in the global testing ecosystem, where accredited labs already operate near throughput limits for certain classes of devices. Through further streamlining of the EAP process, the Commission can proactively prevent new constraints created by a reduction in global testing infrastructure from translating into longer certification queues, delayed product launches, and increased costs for U.S. manufacturers and consumers.

IV. Conclusion

We appreciate the Commission's diligent efforts to modernize its existing regulations, while acknowledging the increasing importance of domestic production and onshoring to alleviate rising security concerns in a modern, connected world. We urge the Commission to couple any further reduction of available testing infrastructure with a commercially reasonable timeline and further streamlining of testing requirements to avoid exacerbating existing capacity constraints in the global testing ecosystem. We look forward to working with the Commission on regulations that strengthen U.S. networks and address ongoing security concerns, while ensuring that the existing global testing infrastructure continues to operate as smoothly and efficiently as possible.

_/s/_____
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July 15, 2026