

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

In the Matter of)	
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Telecommunication Technology Labs, CAICT)	ET Docket No. 25-267
Designation No. CN1349)	
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**NOTICE OF INTENT TO BEGIN PROCEEDINGS TO WITHDRAW RECOGNITION
AS AN ACCREDITED TEST LABORATORY**

Adopted: September 8, 2025

Released: September 8, 2025

By the Acting Chief, Office of Engineering and Technology:

I. INTRODUCTION

1. Pursuant to our authority under sections 302(e) of the Communications Act of 1934, as amended (the Act),¹ the Acting Chief, Office of Engineering and Technology (OET) provides notice to Telecommunication Technology Labs, CAICT (TTL or Company) that the Federal Communications Commission (FCC or Commission) intends to begin proceedings to withdraw its recognition of TTL as an accredited test laboratory, pursuant to sections 2.951(d)(1) and (e) of the Commission's rules, as adopted in its recent *Equipment Authorization Integrity Report and Order*.² TTL may respond to this Notice by October 14, 2025, to demonstrate why the Commission should not begin proceedings to withdraw its recognition on the basis that the Company is owned by, controlled by, or subject to the direction of a prohibited entity, as defined under section 2.902 of the Commission's rules.³

II. BACKGROUND

2. *Legal Framework.* Under section 302 of the Act, the Commission has adopted technical standards and authorization procedures for equipment that emits radio frequency (RF) energy and that can cause harmful interference to radio communications.⁴ In doing so, the Commission has authorized the use of test labs and has established appropriate standards and qualifications for those labs.⁵ The Commission will not recognize any test lab that fails to meet all of the appropriate standards, including standards that concern the integrity and trustworthiness of the test lab. In the *Equipment Authorization Integrity R&O*, the Commission adopted rules to promote the integrity of our equipment authorization program and to protect our communications equipment supply chain from entities posing unacceptable risks to national

¹ 47 U.S.C. § 302a(e).

² 47 CFR § 2.951(d)(1), (e); *see Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program*, Report and Order and Further Notice of Proposed Rulemaking, ET Docket No. 24-136, FCC 25-27, para. 94 (2025) (*Equipment Authorization Integrity R&O*).

³ 47 CFR § 2.902.

⁴ 47 U.S.C. § 302a(a); *see generally* 47 CFR pt. 2 subpt. J (equipment authorization procedures).

⁵ 47 U.S.C. § 302a(e)(1), (3); *see* 47 CFR § 2.948.

security.⁶ These rules “ensure that the . . . measurement facilities (test labs) . . . that participate in our equipment authorization program are not subject to ownership, direction, or control by untrustworthy actors that pose a risk to national security.”⁷

3. Section 2.951(d) of the Commission’s rules provides that the Commission will withdraw its recognition of any laboratory that is owned by, controlled by, or subject to the direction of a prohibited entity, as defined by section 2.902 of the Commission’s rules.⁸ Section 2.902 partly defines “owned by, controlled by, or subject to the direction of” to mean any entity in which any other entity “directly or indirectly possesses or has the power (whether or not exercised) to determine, direct, or decide important matters affecting the subject entity,” or any entity that “acts in any other capacity at the order or request of another entity or whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in majority part, including being part of a governmental structure or hierarchy.”⁹ This rule further provides that “prohibited entities” include entities that have been determined to be a foreign adversary by the Secretary of Commerce, based on Executive Branch sources, and are listed in 15 CFR § 791.4.¹⁰

4. *Factual Background.* TTL is an accredited test laboratory based in Beijing that is recognized by the FCC to test a wide range of RF devices for compliance with applicable FCC rules.¹¹ In test reports submitted to support equipment certifications, TTL CAICT has described itself as “an ISO/IEC 17025:2005 accredited test laboratory under American Association for Laboratory Accreditation (A2LA) with lab code 7049.01” and as an “FCC accredited test laboratory¹² (CN1349), and ISED accredited test laboratory (CAB identifier:CN0066).”¹³ Since its initial accreditation in 2007, TTL has performed testing that contributed to thousands of equipment certifications, including grants held by Huawei Technology Co., Ltd. and ZTE Corporation, entities whose equipment was included on the FCC’s Covered List as of March 12, 2021.¹⁴ TTL is also a department within the China Academy of Information and Communications Technology (CAICT).¹⁵ CAICT is a “scientific research institute

⁶ See *Equipment Authorization Integrity R&O*, FCC 25-27, paras. 1, 8.

⁷ *Id.* at para. 1.

⁸ 47 CFR § 2.951(d)(1). “The Commission will notify a laboratory in writing of its intention to withdraw the laboratory’s recognition and provide at least 30 days for the lab to respond.” *Id.* § 2.951(e).

⁹ 47 CFR § 2.902.

¹⁰ *Id.*

¹¹ TTL is accredited by A2LA and recognized by the FCC to test unintentional radiators, ISM (industrial, scientific, and medical Equipment), intentional radiators, UPCS, U-NII without DFS Intentional Radiators, U-NII with DFS Intentional Radiators, UWB Intentional Radiators, White Space Device Intentional Radiators, Commercial Mobile Services, General Mobile Radio Services, Citizens Broadband Radio Services, Microwave and Millimeter Bands Radio Services, RF Exposure, and Hearing Aid Compatibility. TTL (FCC designation number CN1349) was last recognized by the FCC on July 31, 2024, with a recognition expiration date of July 23, 2026.

¹² While the FCC may *recognize* a foreign test lab (measurement facility) pursuant to section 2.951 of the Commission’s rules, the FCC does not itself accredit such labs. See 47 CFR § 2.951(a), (e).

¹³ See *TCL Comm. Ltd., Equipment Certification*, FCC ID 2ACCCJH193, WLAN Part 15 C Test Report No. 25T04Z100529-003, Section 1.1 (granted May 14, 2025). Certification test reports and other equipment authorization documents can be found on the Commission’s website by searching for the FCC ID in OET’s equipment authorization database, <https://apps.fcc.gov/oetcf/eas/reports/GenericSearch.cfm>.

¹⁴ See List of Equipment and Services Covered by Section 2 of The Secure Networks Act, <https://www.fcc.gov/supplychain/coveredlist> (updated June 4, 2025) (FCC Covered List).

¹⁵ See, e.g., CAICT, *About Us*, <http://www.caict.ac.cn/english/about/dept/> (listing CTTL Terminal Labs as a business department within CAICT) (last visited Sept. 4, 2025).

directly under the Ministry of Industry and Information Technology (MIIT),”¹⁶ which itself is an agency under the State Council of the People’s Republic of China (PRC or China).¹⁷ The U.S. Department of Commerce, based on numerous Executive Branch sources, has determined that the PRC is a foreign adversary.¹⁸

III. DISCUSSION

5. The PRC is a prohibited entity that is identified within section 2.902 of the Commission’s rules.¹⁹ OET has tentatively determined that TTL is owned by, controlled by, or subject to the direction of the PRC, a prohibited entity pursuant to sections 2.951(d)(1) and 2.902 of the Commission’s rules.²⁰ Therefore, OET hereby provides notice of the Commission’s intent to begin proceedings to withdraw its recognition of TTL, as required by section 2.951(e) of the Commission’s rules.

6. TTL identifies itself as “Telecommunication Technology Labs, CAICT” and identifies its website address as “www.caict.ac.cn” within test lab reports that it produces for FCC equipment certification applications.²¹ As a “scientific research institute directly under the [MIIT] of China,”²² CAICT appears to hold responsibility for the development and implementation of Chinese telecommunications strategies and policy.²³ The MIIT is a policy arm of the State Council of the PRC that appears to be responsible for developing communications networks and security policies and for monitoring and regulating the entities that comprise the communications industry within China.²⁴ MIIT-regulated entities within China appear to include the providers of telecommunications services and the manufacturers of telecommunications equipment, as well as the test laboratories that facilitate the authorization of RF equipment that is marketed and operated in U.S. homes, businesses, and government agencies.

7. Accordingly, we tentatively determine that the PRC “directly or indirectly . . . has the power (whether or not exercised) to determine, direct, or decide important matters” that affect TTL

¹⁶ See, e.g. CAICT, *About Us*, http://www.caict.ac.cn/english/about/202004/t20200413_279063.html (last visited Sept. 4, 2025). In 2014, the China Academy of Telecommunication Research of the Ministry of Industry and Information Technology became the China Academy of Information and Communications Technology (CAICT). *Id.* In the People’s Republic of China, CAICT implements policies of the Chinese government by “provid[ing] support to the development and implementation of a series of major national strategies and policies concerning ICT [Information and Communications Technology] and the integration of industrialization and information.” CAICT, *Business*, http://www.caict.ac.cn/english/buss/202004/t20200417_279512.html (last visited Sept. 4, 2025).

¹⁷ “The Ministry of Industry and Information Technology of the People’s Republic of China was founded in 2008 as a department of the State Council responsible for the country’s industrial branches and information industry.” State Council, People’s Republic of China, *Ministry of Industry and Information Technology*, https://english.www.gov.cn/state_council/2014/08/23/content_281474983035940.htm (last visited Sept. 4, 2025).

¹⁸ 15 CFR § 791.4(a)(1).

¹⁹ 47 CFR § 2.902 (establishing that entities identified as “foreign adversaries” in 15 CFR § 791.4 are “prohibited entities” under the Commission’s rules).

²⁰ 47 CFR §§ 2.902, 2.951(d).

²¹ TTL variously identifies itself as CTTL-Telecommunication Technology Labs, CAICT or as Telecommunication Technology Labs, CAICT in test reports filed with the Commission. See, e.g., *TCL Communication Ltd.*, Equipment Certification, FCC ID 2ACCJB129, Test Report No. I20Z60999-EMC01 (granted Aug. 06, 2020).

²² See, e.g., CAICT, *About Us*, http://www.caict.ac.cn/english/about/202004/t20200413_279063.html (last visited Sept. 4, 2025).

²³ See CAICT, *Business*, http://www.caict.ac.cn/english/buss/202004/t20200417_279512.html (last visited Sept. 4, 2025). This citation retains the name of the webpage without correction.

²⁴ See State Council, People’s Republic of China, *Ministry of Industry and Information Technology*, https://english.www.gov.cn/state_council/2014/08/23/content_281474983035940.htm (noting MIIT’s responsibility for the administration of the industrial branches and information industry) (last visited Sept. 4, 2025).

because the PRC controls MIIT, which in turn controls CAICT.²⁵ We further tentatively determine that TTL acts “at the order or request of another entity,” or is an entity “whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in majority part, including being part of a governmental structure or hierarchy.”²⁶ TTL thus appears to be subject to control by and direction of China, via the CAICT and the MIIT.

8. In accordance with the Commission’s rules, TTL has until October 14, 2025, to respond to this Notice of Intent to Begin Proceedings to Withdraw Recognition.²⁷ In any response, TTL must fully address whether the Company is owned by, controlled by, or subject to the direction of the PRC. Any response must be provided in English and must be accompanied by official business documents, including an English-language translation, that support the Company’s position and by supporting sworn declarations of individuals with personal knowledge that are signed in accordance with section 1.16 of the Commission’s rules.²⁸ All documents must include the FCC docket number and lab designation number(s) referenced in the caption and be e-mailed to Jamie Coleman at jamie.coleman@fcc.gov. All submitted documents must be in English or include an English translation. The written statement must also be filed electronically in the docket referenced in the caption of this document using the Electronic Comment Filing System at <https://www.fcc.gov/ecfs>. Any request that material submitted not be made public may be submitted pursuant to 47 CFR § 0.459.

IV. ORDERING CLAUSES

9. Accordingly, **IT IS ORDERED** that, pursuant to section 302 of the Act, 47 U.S.C. § 302a, and section 2.951(e) of the Commission’s rules, 47 CFR § 2.951(e), Telecommunications Technology Labs, CAICT **IS NOTIFIED OF THE COMMISSION’S INTENT TO BEGIN PROCEEDINGS TO WITHDRAW RECOGNITION** and that it may file a written response to this Notice by October 14, 2025.

10. **IT IS FURTHER ORDERED** that the Notice shall be provided by e-mail to zhujijiang@caict.ac.cn on the release date of this Notice and also that a copy shall be sent by first class mail and certified mail, return receipt requested, to Jiyang Zhu, Telecommunications Technology Labs, No. 52 Huayuan North Road, Haidian District, Beijing, People’s Republic of China, 100191.

FEDERAL COMMUNICATIONS COMMISSION

Andrew C. Hendrickson
Acting Chief
Office of Engineering and Technology

²⁵ 47 CFR § 2.902.

²⁶ *Id.*

²⁷ 47 CFR § 2.951(e).

²⁸ 47 CFR § 1.16.