

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

In the Matter of	)	
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TUV Rheinland/CCIC (Ningbo) Co., Ltd.	)	ET Docket No. 25-269
Designation No. CN1237	)	
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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),<sup>1</sup> the Acting Chief, Office of Engineering and Technology (OET) provides notice to TUV Rheinland/CCIC (Ningbo) Co., Ltd. (TUV/Ningbo or Company) that the Federal Communications Commission (FCC or Commission) intends to begin proceedings to withdraw its recognition of TUV/Ningbo 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*.<sup>2</sup> TUV/Ningbo 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.<sup>3</sup>

**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.<sup>4</sup> In doing so, the Commission has authorized the use of test labs and has established appropriate standards and qualifications for those labs.<sup>5</sup> 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

<sup>1</sup> 47 U.S.C. § 302a(e).

<sup>2</sup> 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*).

<sup>3</sup> 47 CFR § 2.902.

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

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

protect our communications equipment supply chain from entities posing unacceptable risks to national security.<sup>6</sup> 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.”<sup>7</sup>

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.<sup>8</sup> 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.”<sup>9</sup> 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.<sup>10</sup>

4. *Factual Background.* TUV/Ningbo is an accredited test laboratory based in Ningbo, Zhejiang, China that is recognized by the FCC to test a wide range of RF devices for compliance with applicable FCC rules.<sup>11</sup> According to the American Association for Laboratory Accreditation (A2LA), TUV/Ningbo’s accreditation states that the laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017 general requirements for the competence of testing and calibration laboratories.<sup>12</sup> Since its initial accreditation, TUV/Ningbo has performed testing that contributed to hundreds of equipment certifications.<sup>13</sup> TUV/Ningbo is connected to the Chinese government through its partnership with the China Certification & Inspection Group Co., Ltd. (CCIC Group), a state-owned enterprise.<sup>14</sup> As a branch of the CCIC Group, TUV/Ningbo is directly tied to a state-owned enterprise with significant connections to and oversight from the government of the People’s

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

<sup>7</sup> *Id.*, at para. 1.

<sup>8</sup> 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).

<sup>9</sup> 47 CFR § 2.902.

<sup>10</sup> *Id.*

<sup>11</sup> TUV/Ningbo is accredited by A2LA and recognized by the FCC to test information technology equipment, industrial, scientific, and medical equipment, household appliances, electric tools and similar apparatus, electrical lighting and similar equipment, unintentional radiators, intentional radiators, and radio frequency equipment. TUV/Ningbo (FCC designation number CN1237) was last recognized by the FCC on March 28, 2025, with a recognition expiration date of June 30, 2026.

<sup>12</sup> American Association for Laboratory Accreditation, Certification for Electrical Testing, Number: 4902.01 (July 17, 2024). 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).

<sup>13</sup> See e.g., *Ningbo Oriental Shengshi Photoelectric Technology Co., Ltd.*, FCC ID: 2A27TDFSS-8007K, Test Report No. CN23ELOG 001 (certification granted Apr. 9, 2024). 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> (last visited Sept. 4, 2025).

<sup>14</sup> China Certification & Inspection Group, *Group Introduction*, <https://www.ccic.com/gywm/jtjj/index.html> (last visited Sept. 4, 2025). According to its website, the CCIC Group provides inspection, verification, certification, and testing services that are intended to ensure the quality, safety, and compliance of telecommunications equipment.

Republic of China (PRC or China). The U.S. Department of Commerce has determined that the PRC is a foreign adversary.<sup>15</sup>

### III. DISCUSSION

5. The PRC is a prohibited entity that is identified within section 2.902 of the Commission's rules.<sup>16</sup> OET has tentatively determined that TUV/Ningbo 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.<sup>17</sup> Therefore, OET hereby provides notice of the Commission's intent to begin proceedings to withdraw its recognition of TUV/Ningbo, as required by section 2.951(e) of the Commission's rules.

6. TUV/Ningbo identifies itself as "TÜV Rheinland / CCIC (Ningbo) Co., Ltd." and identifies its website address as "www.tuv.com" within test lab reports that it produces for FCC equipment certification applications.<sup>18</sup> The TUV/Ningbo joint venture is subordinate to the CCIC Group. The CCIC Group's website lists China Certification & Inspection Group Ningbo, Co., Ltd., part of the TUV/Ningbo joint venture, as one of its subsidiaries in China.<sup>19</sup> The CCIC Group is a state-owned enterprise, established with the approval of the State Council of the PRC and under the supervision of the State-owned Assets Supervision and Administration Commission of the State Council (SASAC).<sup>20</sup> SASAC exercises comprehensive control and oversight over state-owned assets and enterprises, with its functions directly mandated by the Central Committee of the Chinese Communist Party.<sup>21</sup>

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 TUV/Ningbo because the PRC controls the State Council and SASAC, which in turn controls the CCIC Group.<sup>22</sup> We further tentatively determine that TUV/Ningbo 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."<sup>23</sup> TUV/Ningbo thus appears to be subject to control by and direction of China, via the CCIC Group, the SASAC, and the State Council of the PRC.

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<sup>15</sup> 15 CFR § 791.4(a)(1).

<sup>16</sup> 47 CFR § 2.902 (establishing that entities identified as "foreign adversaries" in 15 CFR § 791.4 are "prohibited entities" under the Commission's rules).

<sup>17</sup> 47 CFR §§ 2.902, 2.951(d).

<sup>18</sup> See, e.g., *Ningbo Oriental Shengshi Photoelectric Technology Co., Ltd.*, FCC ID: 2A27TDFSS-8007K, Test Report No. CN23ELOG 001 (certification granted Apr. 9, 2024).

<sup>19</sup> China Certification & Inspection Group, *Worldwide Network*, <https://ccicae.com/our-contact/worldwide-network/> (last visited Sept. 4, 2025).

<sup>20</sup> China Certification & Inspection Group, *Group Introduction*, <https://www.ccic.com/gywm/jtjj/index.html> (last visited Sept. 4, 2025) ("China Inspection and Certification Group (referred to as China Inspection, English abbreviation CCIC) is a central enterprise approved by the State Council and managed by the SASAC of the State Council, and is a comprehensive quality service organization with 'inspection, testing, certification, standards, and measurement' as the main industry, which was created in 1980."); see also State-owned Assets Supervision and Administration Commission of the State Council, *About Us*, <http://en.sasac.gov.cn/sasacaboutus.html> (last visited Sept. 4, 2025).

<sup>21</sup> State-owned Assets and Supervision and Administrative Commission of the State Council, *About Us*, <http://en.sasac.gov.cn/aboutus.html> (last visited Sept. 4, 2025).

<sup>22</sup> 47 CFR § 2.902.

<sup>23</sup> *Id.*

8. In accordance with the Commission's rules, TUV/Ningbo has until October 14, 2025, to respond to this Notice of Intent to Begin Proceedings to Withdraw Recognition.<sup>24</sup> In any response, TUV/Ningbo 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.<sup>25</sup> 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](mailto: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, TUV/Ningbo **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 email to [thorsten.keiter@tuv.com](mailto:thorsten.keiter@tuv.com) and [feng.liang@tuv.com](mailto:feng.liang@tuv.com) 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 Thorsten Keiter and Feng Liang, TUV Rheinland/CCIC (Ningbo) Co., Ltd., 1<sup>st</sup> Floor, Building 11, Scholar Innovation Park, No. 1188 Zhongguan Road, Zhenhai District, Ningbo, People's Republic of China, 315200.

FEDERAL COMMUNICATIONS COMMISSION

Andrew C. Hendrickson  
Acting Chief  
Office of Engineering and Technology

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<sup>24</sup> 47 CFR § 2.951(e).

<sup>25</sup> 47 CFR § 1.16.