

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

In the Matter of)	
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UL-CCIC Company Limited)	ET Docket No. 25-270
Designation No. CN1247)	
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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 UL-CCIC Company Limited (UL-CCIC or Company)² that the Federal Communications Commission (FCC or Commission) intends to begin proceedings to withdraw its recognition of UL-CCIC 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*.³ UL-CCIC 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.⁴

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.⁵ In doing so, the Commission has authorized the use of test labs and has established appropriate standards and qualifications for those labs.⁶ The Commission

¹ 47 U.S.C. § 302a(e).

² China Certification & Inspection Group Co., Ltd. and UL, LLC, executed an Amended and Restated Joint Venture Contract, dated October 28, 2022, pursuant to which each entity holds a fifty-percent (50%) equity and voting interest. The amended and restated agreement extended the original agreement executed on June 26, 2002, through which UL-CCIC provides inspection and verification, certification, and testing services in China and internationally.

³ 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*).

⁴ 47 CFR § 2.902.

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

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

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 security.⁷ 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.”⁸

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.⁹ 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.”¹⁰ 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 § 791.4.¹¹

4. *Factual Background.* UL-CCIC is an accredited test laboratory with American Association for Laboratory Accreditation (A2LA) Certificate No. 4829.01 based in Suzhou, China that is recognized by the FCC to test a wide range of RF devices for compliance with applicable FCC rules.¹² In test reports submitted to support equipment certifications, UL-CCIC has described itself as being an “ISO/IEC 17025:2017” accredited test laboratory under the A2LA, and as an FCC accredited test laboratory¹³ (FCC Designation No. CN1247) (CAB identifier: CN0073). Since its initial accreditation in 2018, UL-CCIC has performed testing that has contributed to hundreds of equipment certifications.¹⁴ The

⁷ See *Equipment Authorization Integrity R&O*, FCC 25-27, paras. 1, 8.

⁸ *Equipment Authorization Integrity R&O*, FCC 25-27, para. 1.

⁹ 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).

¹⁰ 47 CFR § 2.902.

¹¹ *Id.*

¹² UL-CCIC is accredited by A2LA and recognized by the FCC to test Electrical and Electronic Equipment, IT Equipment, Sound and Television Broadcast Receivers and Associated Equipment, Household Appliances, Electric Tools and Similar Equipment, General Lighting Equipment, Short-range Devices, Mobile and Portable Radio and Digital Cellular Radio, Industrial Scientific and Medical Equipment, RLAN Devices, Short Range Devices, and Wireless communication devices. UL-CCIC (FCC designation number CN1247) was last recognized by the FCC on August 4, 2025, with a recognition expiration date of June 30, 2026. UL-CCIC is identified in the A2LA database as UL-CCIC Company Limited (A2LA Certificate No. 4829.01) at <https://customer.a2la.org/index.cfm?event=directory.detail&labPID=1A48F604-8B30-4293-AD52-5DF57032B52E> (last visited Sep. 4, 2025).

¹³ 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).

¹⁴ See e.g., *Beijing Roborock Technology Co., Ltd.*, FCC ID 2AN2O-RRE0VSP01, RSS-247 Issue 3, Test Report No. 4791759006-1 (granted July 15, 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> (last visited Sep. 4, 2025).

U.S. Department of Commerce, based on numerous Executive Branch sources, has determined that the People's Republic of China (PRC or China) is a foreign adversary.¹⁵

III. DISCUSSION

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

6. UL-CCIC identifies itself as "UL-CCIC Company Limited" and identifies its website address as "www.ul.com" within test lab reports that it produced for FCC equipment certification applications.¹⁷ UL-CCIC is a joint venture between UL LLC and the CCIC Group that is incorporated in the PRC and provides testing, inspection, and certification services to manufacturers in China.¹⁸ 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).¹⁹ 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.²⁰

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 UL-CCIC because the PRC has, at a minimum, negative control of the Company.²¹ We further tentatively determine that UL-CCIC 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 part, including being part of a governmental structure or hierarchy."²² UL-CCIC thus appears to be subject to control by and direction of the PRC.

¹⁵ 15 CFR § 791.4(a)(1).

¹⁶ 47 CFR §§ 2.902, 2.951(d).

¹⁷ UL-CCIC identified itself as UL-CCIC Company Limited (FCC Designation No. CN1247, A2LA Certificate No. 4829.01) in test reports filed with the Commission. *See, e.g., Beijing Roborock Technology Co., Ltd.*, FCC ID 2AN2O-RRE0VSP01, RSS-247 Issue 3, Test Report No. 4791759006-1, 2, part 3, Facilities and Accreditation (granted July 15, 2025).

¹⁸ S-1 Registration Statement, UL Solutions Inc. (parent company of UL-CCIC), at 1, 42 (Nov. 13, 2023) <https://www.sec.gov/Archives/edgar/data/1901440/000162828023038399/ul-sx1.htm>. (Nov. 13, 2023) ("The Chinese government may exercise significant oversight and discretion over the conduct of our, including UL-CCIC's, business there and may intervene in or influence our operations, which could result in a material adverse change in our, including UL-CCIC's, operations or the value of our Class A common stock."); *see also* note 12, *supra*.

¹⁹ China Certification & Inspection Group, *Group Introduction*, <https://www.ccic.com/gywm/jtjj/index.html> (last visited Aug. 25, 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 Sep. 4, 2025).

²⁰ State-owned Assets and Supervision and Administrative Commission of the State Council, *About Us*, <http://en.sasac.gov.cn/aboutus.html> (last visited Sep. 4, 2025).

²¹ *See* notes 2, 18, *supra*; 47 CFR § 2.902.

²² 47 CFR § 2.902.

8. In accordance with the Commission's rules, UL-CCIC has until October 14, 2025, to respond to this Notice of Intent to Begin Proceedings to Withdraw Recognition.²³ In any response, UL-CCIC 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.²⁴ 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), UL-CCIC Company Limited **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 this Notice shall be provided by email to jie.qian@ul.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 Jie Qian, UL-CCIC Company Limited, No. 2 Chengwan Road, Suzhou Industrial Park, Suzhou, China 215122.

FEDERAL COMMUNICATIONS COMMISSION

Andrew C. Hendrickson
Acting Chief
Office of Engineering and Technology

²³ 47 CFR § 2.951(e).

²⁴ 47 CFR § 1.16.