

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

In the Matter of)	
)	
CQC Internet of Vehicles Technical Service Co.,)	ET Docket No. 25-271
Ltd)	
Designation No. CN1329)	
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)	
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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 CQC Internet of Vehicles Technical Service Co., Ltd (CQC-IVTS or Company)² that the Federal Communications Commission (FCC or Commission) intends to begin proceedings to withdraw its recognition of CQC-IVTS 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 CQC-IVTS 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

¹ 47 U.S.C. § 302a(e).

² CQC Internet of Vehicles Technical Service Co., Ltd is the name of the entity that sought FCC recognition, but it is also referred to as "CQC IoV Technology Service (Shenzhen) Co., Ltd." and "CQC IoV" in various sources. *See, e.g., Farben*, Farben and China IoV Product Quality Inspection and Testing Center Set up Joint Innovation Laboratory and Reach Strategic Cooperation, <https://www.farbeninfo.com/company-news/1229.html> (last visited Sept. 4, 2024).

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).

of test labs and has established appropriate standards and qualifications for those labs.⁶ 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 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.* CQC-IVTS is an accredited test laboratory based in Shenzhen that is recognized by the FCC to test a wide range of RF devices for compliance with applicable FCC rules.¹² Since its initial accreditation in 2022,¹³ CQC-IVTS has performed testing that contributed to equipment certifications.¹⁴ CQC-IVTS is a wholly-owned subsidiary of the China Quality Certification Center

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

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

⁸ *Id.* at 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 CQC-IVTS is accredited by A2LA and recognized by the FCC to test unintentional radiators, ISM (industrial, scientific, and medical Equipment), intentional radiators, U-NII without DFS Intentional Radiators, U-NII with DFS Intentional Radiators, UWB Intentional Radiators, Commercial Mobile Services, General Mobile Radio Services, Citizens Broadband Radio Services, Microwave and Millimeter Bands Radio Services, and Broadcast Radio Services. CQC-IVTS (FCC designation number CN1329, ISO/IEC 17025:2017) was last recognized by the FCC on December 2, 2024, with a recognition expiration date of April 30, 2026. *See* https://apps.fcc.gov/oetcf/eas/reports/ViewTestFirmAccredScopes.cfm?calledFromFrame=N&RequestTimeout=500®num_specified=N&test_firm_id=8202 (last visited Sept. 4, 2025). 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* A2LA, Recognition of Accreditation, www.a2la.org (last visited Sept. 4, 2025); *see also* FCC Recognition of Accreditation Letter to Ryan Kidwiler, A2LA, from Jihad Hermes, FCC Office of Engineering and Technology, Laboratory Division, Aug. 3, 2022, https://apps.fcc.gov/oetcf/eas/reports/ViewCorrespondenceReport.cfm?calledFromFrame=N&RequestTimeout=500&application_id=N03XY1P%2BHJNKddzE4ACRkg%3D%3D (last visited Sept. 4, 2025).

¹⁴ *See e.g., Portable Multimedia Limited*, CQC Test Report No. CQC-IVTS-2023-0189 submitted in support of Equipment Certification FCC ID: 2AOT9-NBIQRWC, (granted Jun. 27, 2023),

(continued....)

(CQC).¹⁵ CQC, in turn, is a certification body that operates under the China Certification and Inspection Group Co., Ltd. (CCIC Group), a state-owned enterprise.¹⁶ As such, CQC-IVTS is directly tied to a state-owned enterprise with significant connections to and oversight from the government of the People's Republic of China (PRC or China). The U.S. Department of Commerce has determined that the PRC is a foreign adversary.¹⁷

III. DISCUSSION

5. The PRC is a prohibited entity that is identified within section 2.902 of the Commission's rules.¹⁸ OET has tentatively determined that CQC-IVTS 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.¹⁹ Therefore, OET hereby provides notice of the Commission's intent to begin proceedings to withdraw its recognition of CQC-IVTS, as required by section 2.951(e) of the Commission's rules.

6. CQC-IVTS identifies itself as "CQC Internet of Vehicles Technical Service, www.cqc.com.cn" in its e-mail address within test lab reports that it produces for FCC equipment certification applications.²⁰ CQC-IVTS is a wholly-owned subsidiary of the CQC,²¹ as the operational entity of the National Vehicle Internet Product Quality Inspection and Testing Center established by the State Administration for Market Regulation and organized by the CQC.²² The CQC is approved by the CCIC Group to "manage the mandated process for manufacturers to get their CCC certifications."²³ The CCIC Group is a state-owned enterprise, established with the approval of the State Council of the PRC

https://apps.fcc.gov/oetcf/eas/reports/ViewExhibitReport.cfm?mode=Exhibits&RequestTimeout=500&calledFromFrame=N&application_id=2Si6Nc3DsW2%2FnikmNYO0Gw%3D%3D&fcc_id=2AOT9-NBIQRWC (last visited Sept. 4, 2025).

¹⁵ *Farben*, Farben and China IoV Product Quality Inspection and Testing Center Set up Joint Innovation Laboratory and Reach Strategic Cooperation, <https://www.farbeninfo.com/company-news/1229.html> (last visited Sept. 4, 2025) ("The China IoV Product Quality Inspection and Testing Center was approved by the State Administration for Market Regulation and recognized as a state-level laboratory in 2022).

¹⁶ See *CCIC Australia Pty Ltd.*, About CQC, <http://www.ccicaus.com/about-cqc/> (last visited Sept. 4, 2025).

¹⁷ 15 CFR § 791.4(a)(1).

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

¹⁹ 47 CFR §§ 2.902, 2.951(d).

²⁰ See, e.g., *Avocor Technologies USA, Inc.*, CQC Test Report No. CQC-IVTS-2023-0124-E2 submitted in support of Equipment Certification, FCC ID: 2BD7U-AVH6520 (granted Feb. 6, 2024) https://apps.fcc.gov/oetcf/eas/reports/ViewExhibitReport.cfm?mode=Exhibits&RequestTimeout=500&calledFromFrame=N&application_id=ApON5eU0NAGNKKj7B3rGuA%3D%3D&fcc_id=2BD7U-AVH7520 (last visited Sept. 4, 2025).

²¹ *Farben*, Farben and China IoV Product Quality Inspection and Testing Center Set up Joint Innovation Laboratory and Reach Strategic Cooperation, <https://www.farbeninfo.com/company-news/1229.html> (last visited Sept. 4, 2025) ("The China IoV Product Quality Inspection and Testing Center was approved by the State Administration for Market Regulation and recognized as a state-level laboratory in 2022.").

²² See *CQC Internet of Vehicles Technical Service (Shenzhen) Co., Ltd.*, <https://www.cqc.com.cn/www/english/industries/automotive-mobility/internet-of-vehicles/> (last visited Sept. 4, 2025). The China Quality Inspection and Testing Center is also referred to as China Quality Inspection and Testing Centre on the same website. See also *China Environmentally Friendly Certification (China Quality Certification Centre (CQC))*, <https://globalecolabelling.net/organisation/china-environmentally-friendly-certification/> (last visited Sept. 4, 2025).

²³ See *China Environmentally Friendly Certification (China Quality Certification Centre (CQC))*, <https://globalecolabelling.net/organisation/china-environmentally-friendly-certification/> (last visited Sept. 4, 2025); *CCIC Australia Pty Ltd.*, About CQC, <http://www.ccicaus.com/about-cqc/> (last visited Sept. 4, 2025).

and under the supervision of the State-owned Assets Supervision and Administration Commission of the State Council (SASAC).²⁴ 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.²⁵

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 CQC-IVTS because the PRC controls CCIC, which in turn controls CQC which controls CQC-IVTS.²⁶ We further tentatively determine that CQC-IVTS 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.”²⁷ CQC-IVTS thus appears to be subject to control by and direction of China, via the CQC and CCIC.

8. In accordance with the Commission’s rules, CQC-IVTS has until October 14, 2025, to respond to this Notice of Intent to Begin Proceedings to Withdraw Recognition.²⁸ In any response, CQC-IVTS 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.²⁹ 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), CQC Internet of Vehicles Technical Service Co., Ltd **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 liwenliang@cqc.com.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 Wenliang Li, CQC Internet of Vehicles Technical

²⁴ 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).

²⁵ 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).

²⁶ 47 CFR § 2.902.

²⁷ *Id.*

²⁸ 47 CFR § 2.951(e).

²⁹ 47 CFR § 1.16.

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FEDERAL COMMUNICATIONS COMMISSION

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