



**Federal Communications Commission  
Washington, DC 20554**

**September 4, 2025**

**DA 25-803**

**SMALL ENTITY COMPLIANCE GUIDE**

**Amendment of the Commission's Rules Regarding  
Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement  
Facilities, and the Equipment Authorization Program**

**FCC 25-27  
ET Docket No. 24-136  
Released May 27, 2025**

In accordance with Section 212 of the Small Business Regulatory Enforcement Fairness Act of 1996, this Small Entity Compliance Guide (Guide) is intended to help small entities—small businesses, small organizations (non-profits), and small governmental jurisdictions—comply with the rules adopted in the above-referenced Federal Communications Commission (FCC or Commission) rulemaking dockets. This Guide is not intended to replace or supersede these rules, but to facilitate compliance with the rules. Although we have attempted to cover all parts of the rules that might be especially important to small entities, the coverage may not be exhaustive. This Guide cannot anticipate all situations in which the rules apply. Furthermore, the Commission retains the discretion to adopt case-by-case approaches, where appropriate, that may differ from this Guide. Any decision regarding a particular small entity will be based on the statute and any relevant rules.

In any civil or administrative action against a small entity for a violation of rules, the content of the Guide may be considered as evidence of the reasonableness or appropriateness of proposed fines, penalties or damages. Interested parties are free to file comments regarding this Guide in the above referenced docket and the appropriateness of its application to a particular situation. The Commission will then consider whether the recommendations or interpretations in the Guide are appropriate in that situation. The Commission may decide to revise this Guide without public notice to reflect changes in its approach to implementing a rule, or it may clarify or update the text of the Guide. Please direct comments and recommendations, or requests for further assistance, to the FCC's Consumer Center:

**1-888-CALL-FCC (1-888-225-5322)**

**Videophone: 1-844-4-FCC-ASL (1-844-432-2275)**

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## I. OBJECTIVES OF THE PROCEEDING

The *Report and Order* strengthens oversight of telecommunications certification bodies (TCBs), measurement facilities (test labs), and laboratory accreditation bodies that take part in the Commission's equipment authorization (EA) program by adopting rules to help ensure such entities are not owned by, or subject to the direction or control of, untrustworthy actors that pose a risk to our national security.<sup>1</sup> In conjunction with our previously established EA program rules that prohibit authorization of equipment that poses a risk to national security, these rules promote the integrity of our EA program, strengthen national security, and advance the Commission's comprehensive strategy that reinforces a secure and resilient communications supply chain. The rules adopted in the *Report and Order* will help the Commission identify entities that federal government agencies or Congress have determined pose national security risks and exclude these untrustworthy entities from participation in our EA program, helping to ensure the integrity of the program.

## II. COMPLIANCE REQUIREMENTS

### **Transition Periods and Provisions for Compliance with the Rules (47 CFR §§ 2.902, 2.949, 2.950, 2.951, 2.960, and 2.962)**

To implement the objectives of this proceeding, the Commission identifies, pursuant to federal agency or congressional determinations, a class of "prohibited entities" that pose national security threats and therefore could adversely affect the trustworthiness of, or otherwise undermine the public's confidence in, a TCB, test lab, or laboratory accreditation body that is owned by, controlled by, or subject to the direction of a prohibited entity, as defined at 47 CFR § 2.902. Second, we prohibit from participation in our equipment authorization process, any TCB, test lab, or laboratory accreditation body that is owned by, controlled by, or subject to the direction of a prohibited entity. This includes a prohibition on the reliance on or use of, for purposes of equipment authorization, any such TCB or test lab, for both certification and supplier's declaration of conformity (SDoC). Third, we will consider a TCB, test lab, or laboratory accreditation body as "owned by" a prohibited entity when a prohibited entity has, possesses, or otherwise controls an equity or voting interest of 10% or more in the TCB, test lab, or laboratory accreditation body. Fourth, we adopt expanded reporting requirements to require that all TCBs, test labs, and laboratory accreditation bodies seeking Commission recognition certify to the Commission that they are not owned by, controlled by, or subject to the direction of a prohibited entity and report all equity or voting interests of 5% or greater by any entity. We will not recognize, and will revoke recognition of, any TCB, test lab, or laboratory accreditation body that fails to provide, or provides false or inaccurate, information or certification. Finally, we clarify our process for withdrawing recognition from test labs and laboratory accreditation bodies.

All recognized TCBs, test labs, and laboratory accreditation bodies must certify to the Commission within 30 days after the effective date of the rules, and thereafter with each request for recognition, that they are not owned by, controlled by, or subject to the direction of a prohibited entity in accordance with § 2.902 of the Commission's rules. In addition, all recognized TCBs, test labs, and laboratory accreditation bodies must report to the Commission within 90 days after the effective date of the rules, and thereafter with each request for recognition, all equity or voting interests of 5% or greater by any entity. The Commission will not recognize, and will revoke any existing recognition of, any TCB, test lab, or laboratory accreditation body that: (1) is owned by, controlled by, or subject to the direction of

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<sup>1</sup> *Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program*, ET Docket No. 24-136, Report and Order and Further Notice of Proposed Rulemaking, FCC 25-27 (2025) (*Report and Order*).

a prohibited entity pursuant to § 2.902; (2) fails to provide, or provides a false or inaccurate, certification, as required; or (3) fails to provide, or provides false or inaccurate, information regarding equity or voting interests of 5% or greater.

### **III. RECORDKEEPING AND REPORTING REQUIREMENTS**

The *Report and Order* contains new or modified information collection requirements to identify and verify entities that pose unacceptable risks to our national security through their participation in our equipment authorization program.

- Certification requirements to implement our prohibition on recognition of TCBs, test labs, and laboratory accreditation bodies that are subject to ownership or direction or control of a prohibited entity (47 CFR §§ 2.949(b)(5) and (d)(1); 2.951(a)(10) and (c)(1); 2.960(a)(2); and 2.962(d)(9)(i)).
  - Recognized TCBs, test labs, and laboratory accreditation bodies, as well as parties seeking FCC recognition, must submit certification to the Commission that the TCB, test lab, or laboratory accreditation body is not owned by, controlled by, or subject to the direction of a prohibited entity pursuant to 47 CFR 2.902.
  - Certification must be provided within 30 days after the effective date of the final rules, and within 30 days after any relevant change to the required information takes effect. Parties seeking recognition as a TCB, test lab, or laboratory accreditation body must provide certification in conjunction with their request for recognition.
- Reporting requirements (47 CFR §§ 2.903(b); 2.949(b)(6) and (d)(2); 2.951(a)(11) and (c)(2); 2.960(a)(3); and 2.962(d)(9)(ii)).
  - All recognized TCBs, test labs, and laboratory accreditation bodies must report, within 90 days after the effective date of the rules, all equity or voting interests of 5% or greater by any entity.
  - Recognized TCBs, test labs, and laboratory accreditation bodies submit an updated report with each subsequent request for recognition and within 30 days after any change to entities that own 5% or more of its equity or voting interests.
  - Parties seeking recognition as a TCB, test lab, or laboratory accreditation body must report all equity or voting interests of 5% or greater by any entity in conjunction with their request for recognition.
  - Additional reporting requirements apply to entities named on the Covered List, a list of communications equipment and services that are deemed to pose an unacceptable risk to the national security of the United States or the security and safety of United States persons, and that is as described at in subpart DD of part 1 of the Commission's rules, 47 C.F.R. § 1.50000 *et seq.*
    - Each entity named on the Covered List must provide to the Commission the full name, mailing address or physical address (if different from mailing address), email address, and telephone number of each of that named entity's associated entities (*e.g.*, subsidiaries or affiliates).
    - The information regarding each entity's associated entities must be provided within 30 days after the effective date of each updated Covered

List and no later than 30 days after any changes to such information occurs.

- Recordkeeping requirements to implement the prohibition, for purposes of SDoC authorization, on the use of test labs that are owned by, controlled by, or subject to the direction of a prohibited entity (47 CFR § 2.938(b)(2)).
  - For equipment subject to the SDoC process, the responsible party must maintain a written and signed certification that, as of the date of testing, the test laboratory performing the testing is not owned by, controlled by, or subject to the direction of a prohibited entity.
  - The Commission may request additional information regarding the test site, test equipment, or the qualifications of the company or individual performing the test for the SDoC process, including documentation identifying any entity that has equity or voting interests of 5% or greater in the test lab.

#### IV. IMPLEMENTATION DATE

The rules in the *Report and Order*, except for the rules identified immediately below, shall become effective 30 days after publication of the text or summary thereof in the Federal Register.

The following rules in the *Report and Order* require approval by the Office of Management and Budget (OMB) under the Paperwork Reduction Act: 47 CFR 2.903(b); 2.911(d)(5)(ii); 2.929(c)(2), (d)(1)(ii); 2.932(e)(2); 2.938(b)(2); 2.949(b)(5)-(6), (d); 47 CFR 2.950 (c)(1)-(2), (d)(1)-(2), and (e)(1)-(2); 2.951(a)(10)-(11), (c); 2.960(a)(2)-(3); 2.962(d)(9); 2.1033(b)(3), (c)(3), and 2.1043(b)(2)(i)(C), (b)(3)(i)(C). The Office of Engineering and Technology will establish and announce the effective date of these sections in a document published in the Federal Register after completion of OMB review.

Prior to a final rule correction published in the Federal Register, the Commission had incorrectly indicated that the effective date of 47 CFR 2.950(c)-(e) in their entirety were delayed indefinitely.

#### V. INTERNET LINKS

A copy of the *Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program* Report and Order is available at: <https://docs.fcc.gov/public/attachments/FCC-25-27A1.pdf>.

A copy of the Federal Register Summary of the *Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program* is available at: <https://www.federalregister.gov/d/2025-14970>.

A copy of the Federal Register final rule correction of the *Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program* Report and Order is available at: <https://www.federalregister.gov/d/2025-16285>.

The Covered List is available on the Commission's website at <https://www.fcc.gov/supplychain/coveredlist>.