

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

In the Matter of	)	
	)	
Telecommunication Technology Labs, CAICT	)	ET Docket No. 25-267
Designation No. CN1349	)	
	)	
	)	

**ORDER INSTITUTING PROCEEDING TO WITHDRAW RECOGNITION
AS AN ACCREDITED TEST LABORATORY**

Adopted: October 24, 2025

Released: October 24, 2025

By the Acting Chief, Office of Engineering and Technology:

I. INTRODUCTION

1. In this Order, the Office of Engineering and Technology (OET) institutes a proceeding to withdraw recognition of Telecommunication Technology Labs CAICT (CTTL or the Company) as an accredited test laboratory pursuant to section 302(e) of the Communications Act of 1934, as amended (the Act), and sections 2.951(d) and (e) of the Commission’s rules.¹

II. BACKGROUND

2. *Legal Framework.* Section 302 of the Act authorizes the Federal Communications Commission (the Commission or FCC) to adopt rules, consistent with the public interest, governing the interference potential of equipment capable of emitting radio frequency (RF) energy.² The Act also allows the Commission to authorize the use of private organizations (test labs) to test for compliance with those rules, and to establish appropriate qualifications and standards for such test labs.³ 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. The Commission’s rules, in part, “ensure that [test labs] that participate in [the FCC’s] equipment authorization program are not subject to ownership, direction, or control by untrustworthy actors that pose a risk to national security.”⁴

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.⁵ Section 2.902 defines “owned by, controlled by, or subject to the direction of” to mean any entity:

(1) In which any other entity has direct or indirect ownership or control of 10% or more equity,

¹ 47 U.S.C. § 302a(e); 47 CFR § 2.951(d), (e).

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

³ 47 U.S.C. § 302a(e)(1), (3); *see* 47 CFR § 2.948, 2.951.

⁴ *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. 1 (2025).

⁵ 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).

voting interest, or stock;

(2) 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

(3) That acts as an agent or representative of another entity or 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.⁶

Section 2.902 further defines “prohibited entities” to include entities identified as “foreign adversaries” by the Department of Commerce pursuant to 15 CFR § 791.4.⁷

4. *Factual Background.* On September 8, 2025, OET provided a notice to CTTL stating:

[CTTL] 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 technical rules. In test reports submitted to support equipment certifications, [CTTL] 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 laboratory (CN1349), and ISED accredited test laboratory (CAB identifier:CN0066).” Since its initial accreditation in 2007, [CTTL] 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. [CTTL] is also a department within the China Academy of Information and Communications Technology (CAICT). CAICT is a “scientific research institute directly under the Ministry of Industry and Information Technology (MIIT),” which itself is an agency under the State Council of the People’s Republic of China (PRC or China). The U.S. Department of Commerce, based on numerous Executive Branch sources, has determined that the PRC is a foreign adversary.⁸

5. *The Notice* further states:

The PRC is a prohibited entity that is identified within section 2.902 of the Commission’s rules. OET has tentatively determined that [CTTL] 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. 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.

[CTTL] 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. As a “scientific research institute directly under the [MIIT] of China,” CAICT appears to hold responsibility for the development and implementation of Chinese telecommunications strategies and policy. 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. 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,

⁶ 47 CFR § 2.902.

⁷ *Id.*

⁸ *Telecommunication Technology Labs, CAICT, Designation No. CN1349*, ET Docket No. 25-267, Notice of Intent to Begin Proceedings to Withdraw Recognition as an Accredited Test Laboratory, DA 25-794, para. 4 (OET Sept. 8, 2025) (*Notice*) (internal citations omitted). In the *Notice*, the Commission refers to Telecommunication Technology Labs, CAICT as “TTL.” Here, we use the term “CTTL” for consistency with the Company’s response.

businesses, and government agencies.⁹

6. The *Notice* further states that:

[OET] tentatively determine[s] that the PRC “directly or indirectly . . . has the power (whether or not exercised) to determine, direct, or decide important matters” that affect [CTTL] because the PRC controls MIIT, which in turn controls CAICT. [OET] further tentatively determine[s] that [CTTL] 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.” [CTTL] thus appears to be subject to control by and direction of [the PRC], via the CAICT and the MIIT.¹⁰

7. The *Notice* provides CTTL an opportunity to respond.¹¹ On October 14, 2025, CTTL submitted a response stating, in relevant part: “CTTL’s legal entity is [CAICT] and CAICT is a public institution 100% owned by the People’s Republic of China.”¹²

III. DISCUSSION

8. By this Order, OET concludes that CTTL has not demonstrated why the Commission should not begin proceedings to withdraw its recognition as an accredited test laboratory. In its *Response*, CTTL expresses opposition to the Commission’s decision to “revoke the recognitions of several Chinese state-owned laboratories, including CTTL” and outlines its history of international conformity testing and other related activities.¹³ But, CTTL concedes that it is 100% owned by the PRC.¹⁴ The Commission’s rules explicitly state that it will not recognize, and will withdraw recognition of, any laboratory that is owned by, or subject to the direction of a prohibited entity.¹⁵

9. Accordingly, OET initiates a proceeding pursuant to section 302(e) of the Act and sections 2.951(d) and (e) of the Commission’s rules to reach a final determination on whether to withdraw recognition of CTTL as an accredited test laboratory.¹⁶ This proceeding affords the Company additional notice and opportunity to file a written response to demonstrate why the Commission should not withdraw its current recognition.

10. CTTL must file a response within thirty-five (35) days after the release of this Order demonstrating why the Commission should not withdraw its recognition. Failure to timely respond or submit a response providing a reasonable basis for why the Commission should not withdraw its recognition may result in withdrawal of recognition. The Company’s response must include a written detailed factual statement fully addressing whether the Company is owned by, controlled by, or subject to the direction of the People’s Republic of China. 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.¹⁷ All documents must include the FCC docket number and lab designation number(s) referenced in the caption and be e-mailed to

⁹ *Id.* paras. 5-6 (internal citations omitted).

¹⁰ *Id.* para. 7 (internal citations omitted).

¹¹ *Id.* para. 8.

¹² *Telecommunication Technology Labs, CAICT, Designation No. CN1349*, ET Docket No. 25-267, Response at 1 (filed Oct. 14, 2025) (*Response*).

¹³ *Id.*

¹⁴ *Id.*

¹⁵ 47 CFR § 2.951(b), (d).

¹⁶ 47 U.S.C. § 302a(e); 47 CFR §§ 2.951(d), (e).

¹⁷ 47 CFR § 1.16.

BadLabs25-267@fcc.gov and 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

11. Accordingly, **IT IS ORDERED** that, pursuant to section 302(e) of the Act, 47 U.S.C. § 302a(e), and sections 2.951(d) and (e) of the Commission's rules, 47 CFR § 2.951(d) and (e), Telecommunications Technology Labs, CTTL **MUST FILE** a written response to this Order within thirty-five (35) calendar days from the release date of this Order.

12. **IT IS FURTHER ORDERED** that a copy of this Order shall be sent by email to zhujiyang@caict.ac.cn on the release date of this Order and also that a copy shall be sent by regular 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