

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

In the Matter of	)	
	)	
CVC Testing Technology Co., Ltd.	)	ET Docket No. 25-272
Designation No. CN1282	)	
	)	
	)	

**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 CVC Testing Technology Co., Ltd (CVC or 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

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

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).

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, 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:

CVC is an accredited test laboratory based in Guangzhou that is recognized by the FCC to test a wide range of RF devices for compliance with applicable FCC technical rules. Since its initial accreditation in 2023, CVC has performed testing that contributed to the granting of approximately seven equipment authorization certifications. This CVC laboratory is one of several regional testing labs under the CVC umbrella. However, it has recently come to our attention that CVC is a subsidiary of the China National Electrical Apparatus Research Institute Co., Ltd., which itself is a subsidiary of the China National Machinery Industry Corporation (Sinomach), a state-owned enterprise that is directly managed by the central 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.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 CVC 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. . . . CVC identifies itself as "a professional third-party quality technology service brand integrating basic research, standardization, testing, certification, calibration and related extension services." Also, as noted above, CVC is a subsidiary of the China National Electrical Apparatus Research Institute Co., Ltd., which itself is a subsidiary of the China National Machinery Industry Corporation (Sinomach), a state-owned enterprise that is directly managed by the central government of the PRC.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 CVC because the PRC controls Sinomach, which in turn controls the China National Electrical Apparatus Research

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).

⁶ 47 CFR § 2.902.

⁷ *Id.*

⁸ *CVC Testing Technology Co., Ltd. Designation No. CNI282*, ET Docket No. 25-272, Notice of Intent to Begin Proceedings to Withdraw Recognition as an Accredited Test Laboratory, DA 25-799, para. 4 (OET Sept. 8, 2025) (*Notice*) (internal citations omitted).

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

Institute Co., Ltd. [OET] further tentatively determine[s] that CVC 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.” CVC thus appears to be subject to control by and direction of the PRC, via the China National Electrical Apparatus Research Institute and Sinomach.¹⁰

7. The *Notice* provides CVC an opportunity to respond.¹¹ On October 14, 2025, CVC submitted a response stating, in relevant part, that “[CVC] is an independent third-party testing organization affiliated with a state-owned, publicly listed holding company. The lab’s operation is independent and there is no circumstance where the testing activities are controlled or directed by any external entities.”¹²

III. DISCUSSION

8. By this Order, OET concludes that CVC has not demonstrated why the Commission should not begin proceedings to withdraw its recognition as an accredited test laboratory. In its *Response*, CVC concedes that it is affiliated with a state-owned, publicly listed holding company.¹³ 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.¹⁴

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 CVC as an accredited test laboratory.¹⁵ 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. CVC 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, including:

- (1) a complete and detailed description of the current ownership and control (direct and indirect) of the Company, including:
 - a. a description of the equity interest and voting interest for any individual or entity (all references to “entity” henceforth shall include any government entity) that holds 5% or greater direct or indirect interest in and/or controls the Company;
 - b. place of organization and primary location of each entity in the ownership structure;
 - c. an organizational chart that illustrates the company’s vertical ownership structure, including the direct and indirect ownership (equity and voting) and controlling interests held by every individual or entity;
- (2) a detailed description of the Company’s corporate governance and decision making, including a

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

¹¹ *Id.* para. 8.

¹² *CVC Testing Technology Co., Ltd. Designation No. CN1282*, ET Docket No. 25-272, Response at 2 (filed Oct. 14, 2025) (*Response*).

¹³ *Id.*

¹⁴ 47 CFR § 2.951(b), (d).

¹⁵ 47 U.S.C. § 302a(e); 47 CFR § 2.951(e).

copy of all policies, contracts, and agreements concerning the company's corporate governance and decision making, and ability to appoint seats on the Board of Directors or manage other similar corporate governance systems or structures;

- (3) identification of all officers, directors, and senior management officials of each company; their employment history (including prior employment with the PRC government and the Chinese Communist Party (CCP)); and their affiliations with the PRC government and the CCP;
- (4) the Company's compliance obligations with PRC laws, including but not limited to the China's 2017 Cybersecurity Law, 2017 National Intelligence Law, and 2019 Cryptography Law, as it relates to the Company's equipment testing activities.

11. 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.¹⁶ All documents must include the FCC docket number and lab designation number(s) referenced in the caption and be e-mailed to BadLabs25-272@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

12. 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), CVC Testing Technology Co., Ltd. **MUST FILE** a written response to this Order within thirty-five (35) calendar days from the release date of this Order.

13. **IT IS FURTHER ORDERED** that a copy of this Order shall be sent by email to qt@cvc.org.cn and liubo@cvc.org.cn on the release date of this Order and also that a copy shall be sent by first class mail and certified mail, return receipt requested, to Lai Wenjing, c/o Liu Bo, Vice General Manager, CVC Testing Technology Co., Ltd., No. 3, Tiantaiyi Road, Kaitai Avenue, Science City, Guangzhou, People's Republic of China, 510663.

FEDERAL COMMUNICATIONS COMMISSION

Andrew C. Hendrickson
Acting Chief
Office of Engineering and Technology

¹⁶ 47 CFR § 1.16.