

**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 WITHDRAWING RECOGNITION
AS AN ACCREDITED TEST LABORATORY**

Adopted: February 12, 2026

Released: February 12, 2026

By the Chief, Office of Engineering and Technology:

I. INTRODUCTION

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

II. BACKGROUND

2. *Legal Framework.* Section 302 of the Act authorizes the Federal Communications Commission (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)(1) 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, voting interest, or stock;

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

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, 40 FCC Rcd 3616, 3617, para. 1 (2025) (EA Integrity Order).

⁵ 47 CFR § 2.951(d)(1).

(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 of the Commission’s rules defines “prohibited entities” to include entities identified as “foreign adversaries” by the U.S. Department of Commerce pursuant to 15 CFR § 791.4.⁷ The 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.⁸

4. *Factual Background.* CTTL is an accredited test laboratory based in Beijing that was last recognized by the FCC to test a wide range of RF devices for compliance with applicable FCC technical rules in July of 2024.⁹ Since its initial accreditation in 2007, CTTL has performed testing that contributed to thousands of equipment certifications. CTTL is also a department within the China Academy of Information and Communications Technology (CAICT).¹⁰ CAICT is a “scientific research institute directly under the Ministry of Industry and Information Technology (MIIT),”¹¹ which itself is an agency under the State Council of the PRC.¹²

5. On September 8, 2025, OET provided CTTL with notice of the Commission’s intent to commence proceedings concerning the potential withdrawal of recognition of CTTL as an accredited test laboratory.¹³ In the *Notice*, OET tentatively determined that the Company is owned by, controlled by, or subject to the direction of a prohibited entity.¹⁴ Because the PRC controls MIIT, which in turn controls

⁶ 47 CFR § 2.902.

⁷ *Id.* Prohibited entities are further defined to include entities identified on the Covered List as well as entities identified by specified sources. *Id.*

⁸ “The Secretary has determined that the following foreign governments or foreign non-government persons have engaged in a long-term pattern or serious instances of conduct significantly adverse to the national security of the United States or security and safety of United States persons and, therefore, constitute foreign adversaries solely for the purposes of the Executive Order, this rule, and any subsequent rule: (1) The People’s Republic of China, including the Hong Kong Special Administrative Region and the Macau Special Administrative Region (China)....” 15 CFR § 791.4(a)(1); *see also* *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*).

⁹ CTTL (FCC designation number CN1349) was last recognized by the FCC on July 31, 2024, with a recognition expiration date of July 23, 2026.

¹⁰ *See, e.g.*, CAICT, *About Us*, https://www.caict.ac.cn/english/about/dept/202003/t20200312_276685.html (listing CTTL Terminal Labs as a unit of CAICT) (last visited Feb. 4, 2026); CAICT, *About Us*, https://www.caict.ac.cn/english/about/dept/202003/t20200312_276685.html (listing CTTL-System Laboratory as a unit of CAICT) (last visited Feb. 4, 2026).

¹¹ *See, e.g.*, CAICT, *About Us*, http://www.caict.ac.cn/english/about/202004/t20200413_279063.html (last visited Feb. 4, 2026).

¹² “The Ministry of Industry and Information Technology of the People’s Republic of China was founded in 2008 as a department of the State Council responsible for the country’s industrial branches and information industry.” State Council, People’s Republic of China, *Ministry of Industry and Information Technology*, https://english.www.gov.cn/state_council/2014/08/23/content_281474983035940.htm (last visited Sept. 4, 2025).

¹³ *See Notice.*

¹⁴ *Id.*

CAICT,¹⁵ the *Notice* tentatively determined that the PRC directly or indirectly has the power (whether or not exercised) “to determine, direct, or decide important matters” that affect CTTL. OET also tentatively determined 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.”¹⁶ The *Notice* thus tentatively determined that CTTL is owned by, controlled by, or subject to the direction of the PRC (a prohibited entity) and provided the Company with an opportunity to respond to the *Notice* by October 14, 2025.¹⁷

6. On October 14, 2025, CTTL submitted its response to the *Notice*.¹⁸ CTTL opposed the Commission’s action, but stated in relevant part that it “is a 100% state-owned institution owned by the People’s Republic of China, jointly established by the China Academy of Information and Communications Technology (CAICT), the Chongqing Economic and Information Technology Commission, and the Nan’an District People’s Government.”¹⁹

7. On October 24, 2025, OET commenced a proceeding to withdraw recognition of CTTL as an accredited test laboratory.²⁰ OET considered the Company’s Response, including the Company’s opposition to the proceeding and its recitation of a history of international conformity testing and other related activities.²¹ OET also recited CTTL’s statement that the laboratory is “100% owned by the PRC.”²² OET concluded that CTTL failed to demonstrate why the Commission should not begin a proceeding to withdraw recognition of the Company as an accredited test laboratory.²³ Accordingly, OET initiated 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.²⁴ The *Order Instituting Proceeding* provided the Company an opportunity to file a response within thirty-five (35) days after the release of the order, permitting CTTL an additional opportunity to demonstrate why the Commission should not withdraw its recognition.²⁵

8. On November 27, 2025, CTTL filed its response to the *Order Instituting Proceeding*.²⁶ CTTL initially “reiterate[s] that CTTL’s legal entity is the China Academy of Information and Communications Technology (CAICT), which is a public institution wholly owned by the People’s

¹⁵ *Id.* at para. 7 (internal citations omitted).

¹⁶ *Id.* at para. 7 (internal citations omitted); *see also* 47 CFR § 2.902.

¹⁷ *Id.* at paras. 7-8; 47 CFR § 2.951(e) (“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.”).

¹⁸ *Telecommunication Technology Labs, CAICT, Designation No. CN1349*, ET Docket No. 25-267, CTTL Response to Notice of Intent to Begin Proceeding to Withdraw Recognition as an Accredited Test Laboratory (filed Oct. 14, 2025) (Response).

¹⁹ *Id.* at 1 (“Chongqing Information and Communications Technology [sic] is a 100% state-owned institution”).

²⁰ *Telecommunication Technology Labs, CAICT, Designation No. CN1349*, ET Docket No. 25-267, Order Instituting Proceeding to Withdraw Recognition As An Accredited Test Laboratory, DA 25-929 (OET Oct. 24, 2025) (*Order Instituting Proceeding*).

²¹ *See id.* at para. 8.

²² *Id.* at para. 8 (citing Response at 1).

²³ *Id.* at para. 8.

²⁴ *Id.* at para. 9.

²⁵ *Id.* at para. 10.

²⁶ *Telecommunication Technology Labs, CAICT, Designation No. CN1349*, ET Docket No. 25-267, CTTL Response to Order Instituting Proceeding to Withdraw Recognition As An Accredited Test Laboratory (filed Nov. 27, 2025) (Response to the Order Instituting Proceeding).

Republic of China.”²⁷ CTTL again notes its broader objection to the Commission’s review of the recognition status of Chinese state-owned laboratories, asserting that the action “is primarily driven by political considerations rather than the purported ‘security’ concerns, and that it is unsupported by any evidence relating to quality or technical competence.”²⁸ CTTL contends that the Commission is adopting “a discriminatory and stigmatizing approach.”²⁹ CTTL states it “believes that a Chinese state-owned laboratory operating strictly under the ISO/IEC 17025 quality framework has neither posed nor will pose any threat to the national security of the United States.”³⁰ CTTL asserts it “has consistently fulfilled its professional responsibilities” and again asserts that its testing activities have not “resulted in a breach of client trust or any information security incident.”³¹ CTTL further contends that the Commission’s decision to revoke the accreditations of several Chinese state-owned laboratories, including CTTL, will ultimately harm the global trade in telecommunications equipment and “undermine the legitimate interests of relevant industries and consumers, including those in the United States.”³²

III. DISCUSSION

9. Based on the information in the record, including CTTL’s Response to the Order Instituting Proceeding, OET concludes that CTTL has failed to demonstrate why the Commission should not withdraw recognition of CTTL as an accredited test laboratory pursuant to section 2.951(d)(1) of the Commission’s rules.³³

10. Section 2.951(d)(1) 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 pursuant to section 2.902 of the Commission’s rules.³⁴ The *Order Instituting Proceeding* directed CTTL to provide a reasonable basis for why the Commission should not withdraw its recognition.³⁵ The *Order Instituting Proceeding* recognized CTTL’s admission that it is an entity that is wholly owned by the PRC,³⁶ a fact that CTTL reaffirmed in its Response to the Order Instituting Proceedings.³⁷ The U.S. Department of Commerce has designated the PRC as a foreign adversary of the United States,³⁸ and section 2.902 of the Commission’s rules provides that entities designated as foreign adversaries in this manner are considered “prohibited entities.”³⁹ CTTL, thus, “is owned by, controlled by, or subject to the direction of a prohibited entity.”⁴⁰ 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.⁴¹

²⁷ *Id.* at 1.

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.*

³² *Id.* at 1-2.

³³ 47 CFR § 2.951(d)(1).

³⁴ *Id.*

³⁵ *Order Instituting Proceeding* at para. 10.

³⁶ *See id.* at para. 8.

³⁷ *See Response to the Order Instituting Proceeding* at 1.

³⁸ 15 CFR § 791.4.

³⁹ 47 CFR § 2.902.

⁴⁰ 47 CFR § 2.951(d)(1).

⁴¹ 47 CFR § 2.951(b), (d).

11. CTTL’s Response to the Order Instituting Proceeding concedes the factual predicate for withdrawal of recognition and argues a policy position opposing the Commission’s initiative to withdraw its recognition of “bad labs” and the Commission’s underlying regulations.⁴² However, in the *EA Integrity Order*, the Commission already considered the policy issues at stake and determined that “it is critical for national security and the integrity of the supply chain that we prohibit from recognition or participation in the equipment authorization program of TCBs, test labs, or laboratory accreditation bodies that are owned by, controlled by, or subject to the direction of a prohibited entity.”⁴³ We therefore reject the Company’s policy arguments why OET should not withdraw its recognition of CTTL as an accredited test laboratory.

12. After fully considering CTTL’s arguments in its Response to the Order Instituting Proceeding, and pursuant to section 302(e) of the Act and section 2.951(d) of the Commission’s rules, OET hereby withdraws recognition of CTTL as an accredited test laboratory.⁴⁴ This action becomes effective immediately upon release of this Order. The Commission will no longer recognize within its equipment authorization program test data or measurements that are performed after this date by the Company.

IV. ORDERING CLAUSES

13. Accordingly, **IT IS ORDERED** that, pursuant to section 302(e) of the Act, 47 U.S.C. § 302a(e), and sections 0.31, 0.241, and 2.951(d) of the Commission’s rules, 47 CFR §§ 0.31, 0.241, 2.951(d), the Commission **HEREBY WITHDRAWS ITS RECOGNITION** of Telecommunication Technology Labs, CAICT (Designation No. CN1349) as an accredited test laboratory.

14. **IT IS FURTHER ORDERED** that a copy of this Order shall be sent by e-mail to zhujiyang@caict.ac.cn on the release date of this Order and a copy 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
Chief
Office of Engineering and Technology

⁴² See generally, Response to the Order Instituting Proceeding.

⁴³ *Bad Labs Order* at 3617, para. 1.

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