

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

In the Matter of)
)
SGS-CSTC Standards Technical Services Co., Ltd.) ET Docket No. 26-111
(Shenzhen) Designation No. CN1336)
)

NOTICE OF INTENT TO BEGIN PROCEEDINGS TO WITHDRAW RECOGNITION
AS AN ACCREDITED TEST LABORATORY

Adopted: May 11, 2026

Released: May 11, 2026

By the 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), the Chief, Office of Engineering and Technology (OET) provides notice to SGS-CSTC Standards Technical Services Co., Ltd. (Shenzhen) (SGS Shenzhen or Company) that the Federal Communications Commission (FCC or Commission) intends to begin proceedings to withdraw its recognition of SGS Shenzhen as an accredited test laboratory, pursuant to sections 2.951(d)(1) and (e) of the Commission’s rules. SGS Shenzhen may respond to this Notice by June 15, 2026, 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.

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. In doing so, the Commission has authorized the use of test labs and has established appropriate standards and qualifications for those labs. 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. 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.”

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. 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.” 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.

4. *Factual Background.* SGS Shenzhen 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. In test reports submitted to support equipment certifications, SGS Shenzhen has described itself as a test laboratory “accredited by the American Association for Laboratory Accreditation (A2LA). Certificate No. 3816.01, recognized by the FCC (CN1336), and recognized by ISED as an accredited testing laboratory (CAB identifier: CN0006).” SGS Shenzhen is subject to 15% ownership by China Standard Science & Technology Group Company Limited, which itself is wholly-owned by the China National Institute of Standardization. The U.S. Department of Commerce, based on numerous Executive Branch sources, has determined that the People’s Republic of China (PRC) is a foreign adversary.¹

III. DISCUSSION

5. The PRC is a prohibited entity that is identified within section 2.902 of the Commission’s rules. OET has tentatively determined that SGS Shenzhen 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 SGS Shenzhen, as required by section 2.951(e) of the Commission’s rules.

6. OET requested information from SGS Shenzhen to determine compliance with the ownership and control restrictions applicable to testing laboratories.² In response, SGS Shenzhen stated that “China Standard Science and Technology Co., Ltd. (‘CSTC’) is a minority shareholder with 15% ownership...CSTC is a commercial entity under the public institution China National Institute of Standardization (‘CNIS’).”³ SGS Shenzhen acknowledged the CSTC is a “PRC incorporated SOE [State Owned Enterprise] entity.”⁴ CNIS is a government entity subordinate to the PRC’s State Administration for Market Regulation.

7. Accordingly, we tentatively determine that the PRC, directly or indirectly, has 10% or more equity, voting interest or stock in SGS Shenzhen; possesses or has the power (whether or not exercised) to determine, direct, or decide important matters affecting SGS Shenzhen; and that SGS Shenzhen acts at the order or request of the PRC, or that SGS Shenzhen is an entity whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in majority part by the PRC.⁵ Through CNIS and CSTC, SGS Shenzhen thus appears to be owned by, controlled by, or subject to the direction of the PRC.

8. In accordance with the Commission’s rules, SGS Shenzhen has until June 15, 2026, to respond to this Notice of Intent to Begin Proceedings to Withdraw Recognition. In any response, SGS Shenzhen 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. All documents must include the FCC docket number and lab designation number(s) referenced in the caption and be e-mailed to Katherine Nevitt at katherine.nevitt@fcc.gov. All submitted documents must be in English or include an English translation.

¹ 15 CFR § 791.4(a)(1).

² See 47 CFR § 2.951(b)(1).

³ Letter from Keny Xu, EMC Laboratory Manager, SGS-CSTC Standards Technical Services Co., Ltd to Justin Rison, Electronics Engineer, Federal Communications Commission Office of Engineering and Technology at 2 (Apr. 2, 2026) (on file in Equipment Authorization System, TFRN 787754).

⁴ *Id.* at 1.

⁵ 47 CFR §§ 2.902, 2.951(d).

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), SGS-CSTC Standards Technical Services Co., Ltd. (Shenzhen) 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 Keny.Xu@sgs.com 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 Keny Xu, No. 1 Workshop, M-10, Middle section, Science & Technology Park, Shenzhen, Guangdong, China. 518057.

FEDERAL COMMUNICATIONS COMMISSION

Andrew C. Hendrickson
Chief
Office of Engineering and Technology