Attention: Mr. Justin Rison

Electronics Engineer
Federal Communications Commission
Office of Engineering & Technology

Washington, DC 20554

April 02,2026

Subject: Response to FCC Request re SGS-CSTC Standards Technical Services Co., Ltd. (Lab Code CN1336)

Dear Mr. Rison,

We write on behalf of **SGS-CSTC Standards Technical Services Co., Ltd.** ("**SGS-CSTC**"), EAS Lab Code **CN1336**) in response to the FCC's email of March 3, 2026, requesting information pursuant to **47 CFR § 2.951(b)(1)** to assist the Commission in determining compliance with the ownership and control restrictions applicable to testing laboratories.

This response addresses SGS-CSTC in its capacity as FCC-recognized testing laboratory CN1336, including any branch locations that operate under CN1336's accreditation scope and quality management system for FCC equipment authorization testing.

We appreciate the Commission's objectives under FCC 25-27 report and order issued on May 27, 2025 and the related implementation guidance and confirm our full cooperation with the Commission's information request and integrity safeguards for the equipment authorization program.

As requested, we provide responses to items (1) to (4), followed by further clarifications regarding operational control, impartiality and security, and a brief note distinguishing SGS-CSTC's structure from laboratories recently addressed by the Commission.

1. Presentation of SGS-CSTC

Corporate Structure

- **SGS-CSTC** is a joint venture incorporated in the People's Republic of China, established under a Joint Venture contract dated 8 July 2011 ("**JV Contract**") with the below shareholding structure as reflected in article 9 of the JV Contract and article 9 of the Articles of Association ("**AoA**") (see attached Annexes 1 and 2).

Shareholders	Contribution	%	Nature
SGS Hong Kong Ltd.	**USD 3,371,667**	**85%**	**Wholly owned SGS Group entity**
China Standard Science and Technology Group Co., Ltd. (CSTC)	**USD 595,000**	**15%**	**PRC incorporated SOE entity**

- **SGS Hong Kong Ltd.** is the majority shareholder with 85% ownership. It is a wholly owned subsidiary of SGS SA, a Swiss TIC company headquartered in the canton of Zug and listed on the SIX Swiss Exchange.

See available corporate organization chart attached below and corporate information for SGS SA at https://www.sgs.com/en/our-company/about-sgs and https://www.sgs.com/-/media/sgscorp/documents/corporate/reports-and-presentations/2020s/2026/sgs-corporate-governance-report-en.cdn.%7BWebsite_Language_Pattern%7D.pdf.

China Standard Science and Technology Co., Ltd. ("**CSTC**") is a minority shareholder with 15% ownership, and without operational control. CSTC is a commercial entity under the public institution China National Institute of Standardization ("**CNIS**"). CSTC was established in 1988 and restructured into a corporate entity in 2012, it serves as the platform for CNIS to implement the national standardization strategy. In May. 2012, CSTC changed its name to **China Standard Science & Technology Group Co., Ltd ("CSSTGC")**.

Governance Structure

SGS-CSTC has a **Board of Directors** composed of 10 members: 7 appointed by SGS and 3 appointed by CSTC (Art. 17 of the AoA and Art. 20(I)(a) of the JV Contract).

The **General Manager** is appointed by SGS in accordance with SGS-CSTC's Articles of Association. Pursuant to Art. 19–20 of the AoA) and Art. 23 of the JV Contract the following responsibilities are vested in the General Manager, daily management, operational control, technical supervision, staffing authority, and laboratory oversight.

The **Chairman of the Board** is appointed by CSTC as required under PRC joint-venture formalities. The Chairman's role as legal representative (AOA Art. 17(d)) is non-executive, confined to governance oversight. The Chairman does not have operational, technical authority over SGS-CSTC's laboratory activities and is not authorized to access laboratories facilities, FCC related IT systems, test data, or test reports.

Access to laboratory facilities, records, testing results and IT systems (including FCC elated systems under laboratory CN1336) is restricted to authorized SGS-CSTC personnel and is administered under SGS Group access controls. None of the members of the Board of Directors appointed by CSTC nor any CSTC [or CNIS] personnel do have access to SGS-CSTC laboratory CN1336 facilities, records, testing results and IT systems.

The SGS Group Chain of Control

SGS-CSTC is structurally and operationally integrated into the SGS Group, which follows a Swiss listed company governance model. Many rules are set centrally to ensure implementation of global technical standards, group procedures, compliance rules, and digital and IT platforms. The Executive Committee drives the strategy and guides operations, and it sets global technical, procedural, and digital frameworks for the entire Group (for more information: https://www.sgs.com/en/our-company/about-sgs/executive-committee).

2. Board Representation and Voting Rights

Board Composition: SGS holds 7 and CSTC holds 3 board seats.

Voting Rights:

- Ordinary decisions are taken by simple majority and are therefore controlled by SGS through its 7/10 director representation.
- Under the AoA (Art. 16 (I); Art. 11) and the JV Contract (Art. 19), the matters requiring unanimous shareholder approval are limited to major corporate actions (e.g.: amendments to the Articles, capital increases/decreases, merger, division, dissolution, and major investment policy), none of which relate to laboratory operations, testing activities, data access, report issuance, personnel decisions, or technical management, which are within the General Manager's delegated authority as appointed by SGS.

Operational Authority held by SGS: The General Manager position appointed by SGS has authority over laboratory operations, accreditation activities, access administration for FCC testing systems, staff management, procurement, budgeting, and technical documentation (as listed in Appendix 2 of the JV Contract, "Job description for General Manager Position").

3. All Relationships with State-Owned Enterprises (SOEs) and Other Potentially Prohibited-Entity Links, Including CSTC

- CSTC is a minority investor only, with (a) 15% shareholding, (b) the right to nominate 3 directors out of 10, and (c) the right to nominate a non-executive Chairman as described above. Other than these governance rights reflected in the JV Contract/AoA, SGS-CSTC has no additional arrangements with CSTC (contractual, operational, management, shared services, or financial) that confer CSTC influence over laboratory operations or access to laboratory information.

- To the extent the Commission's analysis considers whether a shareholder is a state-owned enterprise or otherwise linked to a prohibited entity, SGS-CSTC respectfully asserts that the relevant question under 47 CFR § 2.902 and FCC 25-27 is whether SGS-CSTC is owned by, controlled by, or subject to the direction of a prohibited entity (including whether such entity can "determine, direct, or decide important matters" for the laboratory). Here, CSTC's minority position does not provide any pathway to direct laboratory operations, quality decisions, systems access, or issuance of FCC test reports, all of which are exercised by SGS appointed management and SGS-CSTC personnel subject to SGS Group governance (see Sections 1–2 above and Appendix II for General Manager authority scope).

- Except for the three non-executive directors appointed by CSTC, CSTC personnel are not employed by SGS-CSTC, do not participate in SGS-CSTC's day-to-day management (including HR, IT administration, quality management, or technical decision-making). CSTC personnel are not assigned operational roles in the laboratory, do not act as technical signatories or quality managers, and are not granted credentials or physical access enabling them to access EMC and related FCC services, client submissions, laboratory systems, or test reports.

EMC laboratory operations and FCC testing records are administered through SGS-CSTC controlled processes and SGS Group governance, with access granted only to authorized SGS-CSTC personnel on a need-to-know basis and subject to audit trails; CSTC personnel do not have user accounts or credentials for these systems.

- Except for the joint venture SGS-CSTC, SGS-CSTC Shenzhen (CN1336) does not maintain any joint venture, joint operation, technical cooperation arrangement, shared services arrangement, or shared information technology systems with PRC state-owned enterprises.

- SGS-CSTC's operations are funded and managed within SGS Group; there is no subsidy or financing by CSTC related to lab operations. Annual budgets, CAPEX, and expenditure approvals are managed under SGS Group financial authorization procedures (including FIN-SOP-007), with approval authority vested in SGS-appointed management; CSTC does not hold veto rights over operational funding.

To conclude, the SGS-CSTC JV is a standalone corporate structure integrated into SGS Group's global governance.

4. Identify All Assets Jointly Owned with CSTC or Any Other SOE

- All assets used in laboratory operations (including those of CN1336) are owned by SGS-CSTC. Under PRC corporate law, all assets are owned by the company as a legal entity, not by the shareholders individually. Therefore, the shareholders, including CSTC, do not hold any title, possession rights, or beneficial ownership of the operational assets.

- There are no assets (IP, standard, methods, laboratory equipment) jointly owned by SGS and CSTC outside the corporate legal entity itself.

- In addition, SGS manages and controls the laboratory assets and the relevant operational processes solely through SGS' appointed management and SGS-CSTC personnel. Physical laboratory premises are operated by SGS-CSTC personnel under SGS Group procedures. Laboratory-systems, FCC specific systems, and data storage are administered under SGS Group IT governance with role-based access controls and audit trails. CSTC personnel do not have accounts or credentials for FCC related systems and are not authorized to access FCC test records or results.

Important additional clarification

We understand that the Commission has recently addressed cases involving laboratories integrated within PRC SOE chains.

SGS-CSTC is materially different. It is majority-owned and operationally controlled by the SGS Group headquartered in Switzerland (via SGS Hong Kong Ltd.), and it is not:

(a) part of a PRC state-owned enterprise chain,

(b) a subsidiary of any PRC governmental structure, or

(c) financed or directed by any State-Owned Enterprise.

Importantly, the governance and operational model described above provides no practical or authorized mechanism for CSTC (or any other party) to manage laboratory operations, gain access to FCC testing systems and records, or influence the issuance of FCC test reports.

CSTC's 15% minority interest and limited governance rights do not give CSTC the ability to "determine, direct, or decide important matters" for SGS-CSTC within the meaning of **47 CFR § 2.902** and **FCC 25-27**, and SGS-CSTC is therefore not **owned by, controlled by, or subject to the direction of a prohibited entity**, including with respect to laboratory operations, systems access, or the integrity of FCC test results.

ISO/IEC 17025 Impartiality and SGS controls

SGS-CSTC FCC laboratories operate under ISO/IEC 17025:2017 impartiality requirements and SGS Group integrity and information-security controls (see Annex 4). While ISO/IEC 17025 is not determinative of the Commission's ownership and control test under 47 CFR § 2.902 and § 2.951(b)(1), these controls provide additional assurance relevant to the integrity of FCC test results by requiring identification and mitigation of undue influence or conflicts of interest and by limiting test-report authorization to qualified SGS-CSTC technical signatories. FCC test data and related records are maintained within SGS-CSTC controlled systems subject to role-based access restrictions and audit trails. CSTC personnel are not authorized users and do not possess credentials enabling access.

For the aforementioned reasons, namely SGS's 85% ownership, SGS's board majority and appointment of executive management, SGS' operational and technical management, and the absence of any CSTC operational role, authority, or authorized access to FCC testing systems and records, SGS-CSTC (CN1336) respectfully asserts that it complies with 47 CFR § 2.951(b)(1) and is not owned by, controlled by, or subject to the direction of a prohibited entity as contemplated by § 2.902 and FCC 25-27. SGS-CSTC therefore respectfully requests that the Commission continue to recognize SGS-CSTC as a testing laboratory in the equipment authorization program.

We remain available to provide any further details or documentation upon request, including (as appropriate) to support the role-based restrictions described above.

Very truly yours,

Keny. Xu

Keny Xu

EMC Laboratory Manager

Annexes

1. SGS-CSTC Joint Venture Agreement
2. Article of Association (appendix II describing all the executive functions of the General Manager acting as the executive head of the Company)
3. Corporate ownership chart (SGS SA, SGS HK, SGS CSTC)
4. ISO/IEC 17025 Accreditation and Impartiality Declaration