STATEMENT OF
COMMISSIONER GEOFFREY STARKS

Re: *Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program*, ET Dkt No. 24-136, Report and Order and Further Notice of Proposed Rulemaking

The simplest way to make sure our networks are safe is to keep bad equipment out in the first place. Over the past few years, we've worked hard to update our equipment authorization rules consistent with the Secure Equipment Act, but our equipment authorization process is only as strong as the sum of its parts.

We place a great deal of trust on the Telecommunications Certifications Bodies (TCBs), test labs, and accreditation bodies that are widely disbursed across the globe. Historically, this hasn't been a problem. In many ways, it benefits innovators to efficiently be able to test their products no matter their location before offering them to United States consumers.

But we now face an increasing risk that adversarial nations will try to sneak insecure and harmful equipment into our networks through our equipment authorization process. To mitigate that threat we need to know that when a test lab certifies equipment, it is doing so on the merits, and not due to undue influence from an adversary. The information collection proposed in this item will help ensure that the third parties we use to ensure conformity to our rules are themselves acting in good faith. Count me in.

Equally important is that when we identify a TCB, test lab, or accreditation body that is owned, controlled, or subject to the direction of a prohibited entity, we alert manufacturers and the public to stop using them. I'm happy that the item now directs PSHSB to release a Public Notice doing just that, and I thank the Chair for working with me on this edit.

I thank the Office of Engineering and Technology, and the many other staff that contributed to this item, for their hard work. I approve.