

FCC Acts in Campaign Against 'Bad' Equipment Test Labs

November 5, 2025

The Federal Communications Commission (FCC) has started the process to withdraw recognition of "bad labs" – equipment testing companies with ties to foreign adversaries, with two public notices released on <u>September 14</u> and <u>September 24</u>. These public notices are the first action since the FCC adopted an order in May <u>setting up</u> the process. They affect 15 testing companies with ties to the government of the People's Republic of China.

The May order prohibits FCC recognition of telecommunications certification bodies (TCBs), test labs and laboratory accreditation bodies owned by, controlled by or subject to the direction of "prohibited entities," and prohibits those TCBs, test labs and laboratory accreditation bodies from participating in the FCC equipment authorization program in any way. Prohibited entities are those designated by parts of the federal government, including Congress, the Department of Defense and the Department of Commerce, as posing risks to national security.

Of the 15 labs targeted to date, the FCC has denied applications to renew the credentials of five companies:

- · CCIC Southern Testing Co.
- Industrial Internet Innovation Center (Shanghai)
- Reliability Laboratory New H3C Technologies
- State Radio Monitoring Center
- Shanghai Institute of Measurement and Testing Technology

The FCC also denied an initial application for recognition filed by CCIC-CSA International Certification Co.

In addition, two companies targeted by the FCC did not seek to renew their accreditation:

- CESI (Guangzhou) Standards
- China Academy of Information and Communications Technology

The remaining companies were given the opportunity to respond to the FCC's initial determination that they were controlled by the Chinese government. They will continue to be accredited until the FCC formally terminates their recognition. Following responses from five of those companies, the FCC issued orders on October 24 formally beginning proceedings to remove recognition as test labs:

- Chongqing Academy of Information and Communications
- CVC Testing
- CVC Testing Shenzen
- TTL CAICT
- TUV Rheinland-CCIC Ningbo Co.

These companies could lose their recognition as soon as the end of November.

The FCC has not issued any orders concerning the remaining companies that it tentatively concluded are not eligible for recognition. They are:

- CQC Internet of Vehicles Technical Service Co.
- UL-CCIC (Only the Chinese affiliate of UL Labs is affected by the FCC notice.)

Under the May order, if the FCC terminates accreditation of an entity for connections to foreign adversaries, it no

longer may participate in any part of the FCC's equipment authorization process. As a result, an affected entity would be unable to, among other things, provide testing for any FCC equipment authorizations, including both certification and the Supplier's Declaration of Conformity used for many products that do not transmit radio signals intentionally.

It is important for any company seeking equipment authorizations to obtain assurances from test labs and TCBs that they remain eligible to provide services in light of the FCC's new requirements. The recent notices are likely to be only the first wave of actions under the May order. That order requires TCBs, test labs and accrediting bodies to report to the FCC if they have prohibited ties to foreign adversaries, and the FCC will act against any entity that reports such connections.

In addition, some entities may choose to stop providing FCC equipment authorization services if they have ties to foreign adversaries that they do not wish to report. It will be important for any company seeking equipment authorization to obtain assurances from test labs and TCBs that they remain eligible to provide services in light of the FCC's new requirements. In addition, other agencies, such as the Consumer Product Safety Commission, have targeted test labs controlled by foreign adversaries for additional scrutiny and could do so in the future.

Cooley professionals can assist in determining how to respond to the FCC's new requirements.

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