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Via Electronic Filing

October 22, 2026

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program, ET Docket No. 24-136

Dear Ms. Dortch:

On October 21, 2026, David Grossman and Rachel Nemeth of the Consumer Technology Association (CTA),¹ met with Adam Chan and Katie McAuliffe of Chairman Carr's office to discuss the *Draft Third Report and Order and Third Further Notice of Proposed Rulemaking* in the above-captioned proceeding.²

CTA expressed appreciation for the Commission's consideration of recommendations made by CTA and other stakeholders in their approach to promoting security and integrity in the equipment authorization process.

During the meeting, CTA discussed several recommendations to strengthen the implementation of the Commission's new laboratory, Telecommunications Certification Bodies (TCBs), and laboratory accreditation bodies requirements while avoiding potential disruptions to manufacturers, supply chains and consumers.

Grandfather existing equipment authorizations and routine product modifications. CTA urged the Commission to clarify that equipment measured and authorized by a recognized laboratory or TCB, respectively, before the applicable

¹ As North America's largest technology trade association, CTA® is the tech sector. Our members are the world's largest innovators—from startups to global brands—helping support more than 17 million American jobs. CTA owns and produces CES®—the most powerful tech event in the world.

² *Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program*, ET Docket No. 24-136, FCC-CIRC2610-05 (rel. October 8, 2026) (*Draft Third R&O* and *Third FNPRM*).

implementation deadline may remain on the market without retesting solely due to the location of those facilities and subsequent loss of recognition under the new rules.³ Consistent with long-standing practice, CTA also recommended expressly stating in the final *Order* that the Commission will consider such equipment fully authorized so that the devices can be marketed, imported, operated and modified without requiring manufacturers to repeat the full testing and authorization process. These clarifications would protect existing product lines who in good faith relied on the Commission's current rules to authorize their products while preserving the Commission's security objectives.

Establish a targeted waiver process to address laboratory capacity constraints.

CTA expressed concern that unforeseen circumstances could arise (e.g., supply chain constraints) that impede efforts to establish new laboratories or move facilities onshore or to countries or territories that have entered into Mutual Recognition Agreement (MRA) or comparable reciprocal agreement with the United States.

As the December 1, 2028, deadline approaches, the Commission should study whether impediments are arising that would create bottlenecks. CTA recommends creating a mechanism in the underlying *Order*, that permits the Commission, should it determine bottlenecks are occurring, to authorize the Office of Engineering and Technology (OET) to grant expedited, time-limited waivers when manufacturers demonstrate that approved laboratories lack sufficient capacity or technical capabilities.⁴ Such waivers could include enhanced security controls, independent verification or additional FCC oversight. This approach would preserve the Commission's national security goals while preventing delays to product launches and disruptions to supply chains, and ensuring American access to technology.

Preserve existing Supplier's Declaration of Conformity (SDoC) procedures and avoid further comment cycles. CTA reinforced the Telecommunications Industry Association's position in the record that the existing SDoC procedures are working well and should remain unchanged.⁵ The Commission should continue efforts to streamline testing processes, including making available "fast track" procedures for trusted test labs and revisiting the necessity of Pre-Approval Guidance (PAG) reviews. CTA also noted that the Commission has already sought public comment on these proposals in this proceeding. Another round of comments is not needed at this time and would delay resolution of these issues.

Continue efforts to streamline equipment testing and approval. CTA encouraged the Commission to further streamline the equipment authorization process, including

³ See *Draft Order* ¶ 123 (discussing the transition date and the status of certification grants).

⁴ For example, CTA understands that labs in the United States must likely acquire specialized equipment that qualifies as "advanced robotic devices" to materially increase their testing capacity, but acquiring such specialized testing equipment has become much more difficult with the addition of such devices to the Covered List.

⁵ Letter from Colin Black Andrews, Senior Director, Government Affairs, Telecommunications Industry Association, to Marlene H. Dortch, Secretary, FCC, ET Docket. No. 24-136 (Oct. 14, 2026).

through expedited “fast track” procedures for trusted test laboratories and a review of existing PAG requirements. CTA welcomed OET’s September 30, 2026, update to its Knowledge Database (KDB), which removed certain technologies from the PAG list, reducing testing burdens without compromising security. CTA encouraged the Commission to build on this progress by identifying additional opportunities to eliminate outdated requirements, reduce delays and speed the introduction of innovative products to market.

CTA appreciates the opportunity to work with the Commission to strengthen enforcement while preserving lawful commerce. We encourage the Commission to adopt these targeted changes to improve national security while giving manufacturers a practical and predictable path to compliance.

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Pursuant to Section 1.1206 of the FCC’s rules, this letter is being electronically filed with the Commission.⁶ Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ J. David Grossman
J. David Grossman
Vice President, Policy and Regulatory Affairs

/s/ Rachel Nemeth
Rachel Nemeth
Vice President, Regulatory and Government Affairs

cc: Meeting Attendees (via email)

⁶ 47 C.F.R. § 1.1206.