Office for Interoperability and Compatibility

Project 25 Compliance Assessment Bulletin

Project 25

Compliance Assessment Program

Laboratory Application Process

P25-CAB-LAB_APP

February 2009

Notice of Disclaimer and Limitation of Liability

The Project 25 Compliance Assessment Program (P25 CAP) provides equipment purchasers demonstrated evidence of a product's compliance with a select group of requirements within the suite of P25 standards. The test procedures used to validate these requirements are also part of the P25 suite of standards. While successful tests will demonstrate P25 compliance for the specific requirements tested, the conclusions drawn from these tests do not apply to every environment or need that individual users may have. P25-CAP-mandated tests only demonstrate product compliance with the test procedures listed in the Supplier's Declaration of Compliance and, therefore, only attest to a product's compliance with specific requirements within the P25 standard.

Revision History

Version	Date	Description
First draft	April 29, 2008	Draft released for review.
Release	July 1, 2008	Final release version approved on June 25, 2008, P25 CAP Governing Board meeting.
Draft	December 16, 2008	Updated based on Office of Management and Budget approval of Laboratory Application.
Release	February 4, 2009	Final release version approved on February 4, 2009, P25 CAP Governing Board meeting.

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1 Introduction

The Project 25 Compliance Assessment Program (P25 CAP) is a voluntary program that allows P25 equipment suppliers to formally demonstrate their products' compliance with a select group of requirements within the suite of P25 standards. The purpose of the Program is to provide emergency response agencies with evidence that the communications equipment they are purchasing meets P25 standards for performance, conformance, and interoperability.

The Program requires test laboratories to demonstrate their competence through a rigorous and objective assessment process. Such a process promotes the user community's confidence in, and acceptance of, test results from recognized laboratories. All equipment suppliers that participate in the P25 CAP must use laboratories recognized by the Department of Homeland Security (DHS) to conduct performance, conformance, and interoperability tests on their products. P25 equipment suppliers will release summary test reports and declarations of compliance based on testing from DHS-recognized labs. This documentation will serve to increase the public's confidence in the performance, conformance, and interoperability of P25 equipment.

Performance, conformance, and interoperability issues are likely to occur in all communications technologies and especially in ones such as P25 where protocols constantly adapt to changing user requirements. Such problems should be resolved within the P25 CAP and, notably, before product launch and deployment. Further, the declaration of compliance-related documents developed by Program participants will provide useful technical information about the equipment.

The P25 CAP will provide the more than 60,000 emergency response agencies nationwide with a consistent and tractable perspective of P25 product compliance. It will also provide a means of verifying that Federal grant dollars are being invested in standardized solutions and equipment that promote interoperability.

1.1 Precedence

This Compliance Assessment Bulletin does not supersede NIST Handbook 153: *Laboratory Recognition Process for Project 25 Compliance Assessment*

1.2 Scope

The P25 CAP was established on the basis of requests from the U.S. Congress. It is a voluntary system that provides a mechanism for the recognition of testing laboratories based on internationally accepted standards. This document provides further explanation regarding the process through which interested laboratories apply for recognition.

1.3 Normative References

None

1.4 Informative References

[1] NIST Handbook 153, Current Version
[2] Charter for the Project 25 Compliance Assessment Program, Current Version

2 Laboratory Application Process

The P25 CAP is a voluntary system that provides a mechanism for the recognition of testing laboratories based on internationally accepted standards. It identifies competent laboratories through assessments by trained laboratory assessment teams, and promotes the acceptance of compliant test results from these laboratories.

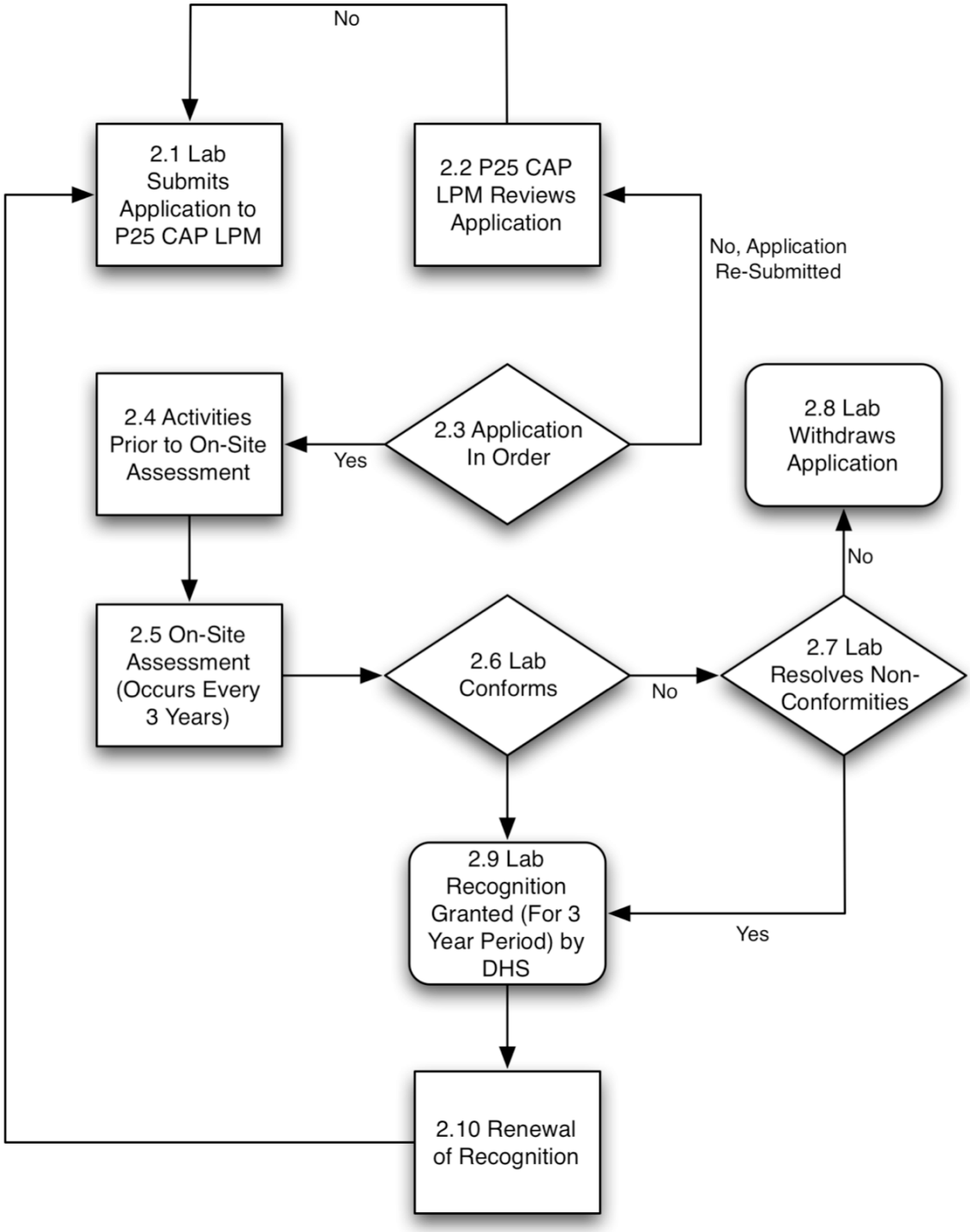
A Laboratory Program Manager (LPM) manages the laboratory assessment part of the P25 CAP. The P25 CAP LPM reports periodically to, and receives feedback from, the P25 Governing Board.

The P25 CAP LPM administers laboratory-related policies and procedures in a non-discriminatory manner. Access to P25 CAP laboratory recognition is not conditioned on the size of a laboratory, a laboratory's membership in any association or group, or the number of laboratories already recognized. P25 CAP services are available to public and private testing laboratories, including commercial laboratories; manufacturers' in-house laboratories; university laboratories; and local, state, and Federal government laboratories. For laboratories operating outside the United States, the P25 CAP LPM may accept reports prepared by laboratory assessment teams operating under the joint International Organization for Standardization, International Electrotechnical Commission 17011 accreditation bodies that have signed a Mutual Recognition Arrangement with the Asia Pacific Laboratory Accreditation Cooperation or the International Laboratory Accreditation Cooperation.

P25 CAP laboratory recognition is based on an evaluation of a laboratory's quality management system and technical competence for conducting specific test methods and measurements in certain fields or scopes of testing. Recognition is granted only after an applicant has demonstrated that it has met all P25 CAP laboratory requirements specified in NIST Handbook 153. Recognition is acknowledged by the issuance of a Certificate and Scope of Recognition, which details the specific test methods, measurements, and services for which a laboratory has been recognized.

Each step in Figure 1 references one of the subsections that follow (2.1 through 2.10), which describe the P25 CAP laboratory application process.

Figure 1. P25 CAP Laboratory Application Process



2.1 Laboratory Submits Application to P25 CAP LPM

To initiate the laboratory recognition process, the applicant laboratory shall submit:

- A completed application form (See Annex A)

- A copy of the quality manual the applicant laboratory follows
- Documentation describing the laboratory and its facilities as it applies to the P25 CAP recognition activities (See Annex A, part 10)

An applicant laboratory shall complete an application for recognition that includes the information specified in the "Conditions for Laboratory Recognition" of Annex A.

By submitting the application, the laboratory's authorized representative commits the laboratory to fulfill the conditions for recognition listed in the P25 CAP Application Form. The authorized representative shall review all documents provided with the application package and become familiar with P25 CAP requirements before submitting the application.

A batch assessment process will occur at the beginning of the P25 CAP to ensure that there are at least two laboratories recognized at the outset. (If, after receiving the first laboratory application for recognition, another laboratory does not apply within two weeks, the first batch application process will be closed, and assessment will begin.) After the first two applications for recognition are received, the P25 CAP LPM will wait two additional weeks before moving forward with the assessment process. Any additional applications received in that two-week period will be considered as part of the first group to be assessed. In the first batch of assessed laboratories, any non-conformities will be subject to the 30-day time limit to address such items. In the event of failure to address non-conformities, said laboratory will be removed from the first batch of laboratories recognized, even in the event that only a single laboratory remains.

After the initial batch of laboratories are recognized, if multiple applications are received within a short period of time, the order in which they are reviewed will be determined by the LPM's received mail and/or e-mail timestamp (i.e., the earliest application received will be reviewed first, then the second, etc.).

2.2 P25 CAP LPM Reviews Application

Upon receipt of a laboratory's application for recognition, the P25 CAP LPM shall:

- Assign a laboratory code to the applicant laboratory
- Acknowledge receipt of the application in writing
- Review the information supplied by the laboratory for adequacy
- Request further information, if necessary
- Specify the next step(s) in the recognition process

2.3 Application in Order

The on-site assessments will be initiated in a first-in, first-out order after the laboratory's application has been determined to be in order.

2.4 Activities Prior to the On-Site Assessment

There are a number of activities that will take place prior to the on-site assessment by the laboratory assessment team. These activities include:

- Assignment of assessor(s)
- Document review
- Scheduling of on-site assessment

The laboratory will be contacted by the lead assessor of the P25 CAP laboratory assessment team to schedule a mutually acceptable date for the on-site assessment. An assessment normally takes two to five days depending on the proposed Scope of Recognition. However, laboratory management should apprise the lead assessor of the laboratory's prior quality system experience and applicable qualifications, since this may affect the scheduled duration of the assessment. Every effort will be made to conduct an assessment with as little disruption as possible to the normal operations of the laboratory.

An on-site assessment will be conducted as a part of the initial recognition process and every three years thereafter (based on the date of initial recognition). Delay of assessments beyond these frequencies may affect a laboratory's recognition status.

2.5 On-Site Assessment

At the beginning of the assessment, an opening meeting will be conducted with management and laboratory personnel to explain the purpose of the on-site assessment and to discuss the schedule for the assessment activities. During the assessment, the laboratory assessment team may:

- Examine equipment and facilities
- Observe demonstrations of testing
- Examine test reports
- Examine the management system
- Review quality and/or technical records and/or procedures
- Review the biographies of staff to determine their competency in their particular area of expertise

Laboratory assessment team members will use a common test method review summary, so that each laboratory receives an assessment comparable to that received by others.

2.6 Laboratory Conforms

An on-site assessment report will be produced by the lead assessor. The lead assessor will leave a copy of the report with the laboratory and forward the original report to the P25 CAP LPM within five

business days of completion of the assessment. The lead assessor is responsible for the content of the on-site assessment report, including the statement of any non-conformities.

2.7 Laboratory Resolves Non-Conformity

If there are non-conformities listed in the on-site assessment report, the laboratory's authorized representative shall respond to the P25 CAP LPM in writing within 30 days. In the event that non-conformities require more than 30 days to investigate, the authorized representative and P25 CAP LPM will agree upon an appropriate response date.

The P25 CAP LPM will respond to written communications from the authorized representative within 30 days.

The authorized representative and P25 CAP LPM will communicate with one another until a corrective action plan has been accepted by the P25 CAP LPM or until all non-conformities are resolved to the satisfaction of the P25 CAP LPM. Unless negotiated in advance, each party shall respond to the other's communications within 30 days or else the laboratory shall withdraw from the recognition process.

2.8 Laboratory Withdraws Application

If non-conformities with the on-site assessment report are not resolved, the applying laboratory may withdraw their application.

2.9 Laboratory Recognition Granted

After the laboratory has responded and closed out all the non-conformities, the P25 CAP LPM will generate a letter of recommendation that is sent to DHS. DHS will make a decision concerning laboratory recognition based on the letter and other considerations.

DHS recognition is granted when a laboratory has met and conformed to all P25 CAP requirements. If there are non-conformities needing resolution, lab recognition may not be granted. Recognition expires and must be renewed within three years of the recognition date.

When recognition is granted, DHS will provide the laboratory with a Certificate and Scope of Recognition identified by its P25 CAP Laboratory Code.

Note that there will be a batch assessment process at the beginning of the Program to ensure that there are at least two laboratories recognized at the outset; see step 2.1 for additional details.

2.10 Renewal of Recognition

Each recognized laboratory will receive a renewal package containing an updated application form approximately twelve months before the expiration date of its recognition; this will allow sufficient time for laboratories to complete the renewal process. The renewal process restarts the recognition process from step 2.1.

The application for renewal shall be received by the P25 CAP LPM at least six months prior to expiration of the laboratory's current recognition to avoid a lapse in recognition. If a laboratory allows its recognition to expire, the P25 CAP LPM may, at his or her discretion, require a new initial assessment.

Annex A – P25 CAP Laboratory Application Form

Project 25

Compliance Assessment Program

Laboratory Application for Assessment and Recognition

Project 25 Compliance Assessment Program
Laboratory Application for Assessment and Recognition

INSTRUCTIONS FOR COMPLETING THE APPLICATION

(1) Thoroughly read all documents furnished in this application package in order to understand the Project 25 Compliance Assessment Program (P25 CAP) laboratory recognition requirements.

(2) Print or type all requested information. Where more space is needed for responses, attach additional pages to the application and identify the question(s) being answered.

(3) Complete the attached application. The laboratory's Authorized Representative must sign page 4 of the application to signify agreement with the P25 CAP Conditions for Laboratory Recognition.

(4) Send all applications and worksheets (retain a photocopy for your records) to:

P25 CAP Laboratory Program Manager
National Institute of Standards and Technology
100 Bureau Drive, Stop 8102
Gaithersburg, MD 20899-8102

or

p25-cap-lpm@nist.gov

For assistance or information regarding lab assessments, contact the P25 Compliance Assessment Program Laboratory Program Manager by phone (301) 975-6061, fax (301) 948-0978, or e-mail p25-cap-lpm@nist.gov.

For assistance or information regarding P25 CAP Laboratory Recognition, contact the Department of Homeland Security's Office for Interoperability and Compatibility CAP Program Manager by phone (202) 254-5332, fax (202) 254-5389, or email p25cap@dhs.gov.

P25 CAP LAB CODE:

P25 CAP LAB APPLICATION FOR ASSESSMENT AND RECOGNITION

1. **LEGAL NAME AND FULL ADDRESS** of the laboratory.

Laboratory Name

Address (Line 1)

Address (Line 2)

City State ZIP + 4

Country

2. **LABORATORY NAME AS YOU WANT IT TO APPEAR ON THE CERTIFICATE AND SCOPE OF RECOGNITION** (65-character limit).

3. **LABORATORY URL** (Web site address). If you wish to have the laboratory's URL listed in the P25 CAP's Internet and hard copy directories, enter the URL below. It is the P25 CAP's policy to display the URL text only; a Web link will not be provided.

4. Is the laboratory currently accredited by the National Institute for Standards and Technology (NIST) National Voluntary Laboratory Accreditation Program (NVLAP) for any field of testing or calibration?

☐ Yes ☐ No. If yes, please provide its NVLAP Lab Code: __ __ __ __ __ __ - 0

5. **OWNERSHIP** of the laboratory.

Name of owner:

_____

Type of ownership (check one):

- ☐ Sole proprietorship
- ☐ Partnership
- ☐ Corporation
- ☐ Federal Government
- ☐ State government
- ☐ Municipal government
- ☐ Other

6. Check one of the following as it applies to the laboratory:

- ☐ Commercial testing service
- ☐ Sometimes available for commercial testing
- ☐ Normally not available for commercial testing

7. **AUTHORIZED REPRESENTATIVE** of the laboratory.

The Authorized Representative is responsible for ensuring that the laboratory complies with the conditions and criteria for recognition. This person's name will appear in P25 CAP directories and on Scopes of Recognition. The Authorized Representative will receive all P25 CAP correspondence and be contacted about on-site assessments.

NAME: _____

Title: _____

Phone Number: _____ Fax Number: _____

E-Mail Address: _____

8. **APPROVED SIGNATORY(S)** of the laboratory.

An Approved Signatory is recognized by the P25 CAP as competent to sign recognized laboratory test reports. The laboratory must designate one or more staff members as an Approved Signatory. The laboratory's Authorized Representative may, if appropriate, also serve as an Approved Signatory.

List the Approved Signatory(s) on page 5. If more space is needed, attach additional pages.

APPROVED SIGNATORIES

NAME 1: _____

Title: _____

Phone Number: _____ Fax Number: _____

E-Mail Address: _____

Scopes of Recognition for which
signatory is approved to sign reports: _____

NAME 2: _____

Title: _____

Phone Number: _____ Fax Number: _____

E-Mail Address: _____

Scopes of Recognition for which
signatory is approved to sign reports: _____

NAME 3: _____

Title: _____

Phone Number: _____ Fax Number: _____

E-Mail Address: _____

Scopes of Recognition for which
signatory is approved to sign reports: _____

NAME 4: _____

Title: _____

Phone Number: _____ Fax Number: _____

E-Mail Address: _____

Scopes of Recognition for which
signatory is approved to sign reports: _____

9. To become recognized and maintain recognition, the testing laboratory must supply its **QUALITY MANUAL** to the P25 CAP. Call the P25 CAP Laboratory Program Manager for specific instructions regarding the laboratory's Quality Manual for this application.

10. **Attach a description of the laboratory and laboratory facilities as they apply to the P25 CAP recognition activities.** The description should include the laboratory purpose(s), size and layout, staff size, major equipment, and use of remote sites/sub-facilities/mobile units.

Describe the scope of operations of the laboratory in the fields of testing for which recognition is being sought, including an indication of the amount of testing that is performed.

Include a brief overview of other testing services offered by this laboratory.

CONDITIONS FOR LABORATORY RECOGNITION

In order to become recognized and maintain recognition, a laboratory shall agree in writing to:
(1) Comply at all times with the requirements for recognition as set forth in NIST Handbook 153
(2) Fulfill the recognition procedure, especially to receive the assessment team
(3) Resolve all deficiencies in accordance with NIST Handbook 153
(4) Report to the P25 CAP Laboratory Program Manager within 30 days any major changes that affect the laboratory's:

- — Legal, commercial, organizational, or ownership status
- — Organization and management (e.g., key managerial staff)
- — Policies or procedures, where appropriate
- — Location
- — Personnel, equipment, facilities, working environment or other resources, where significant
- — Authorized Representative or Approved Signatories
- — Other such matters that may affect the laboratory's capability, or scope of recognition activities, or compliance with the requirements of NIST Handbook 153

(5) Return to the P25 CAP Laboratory Program Manager the Certificate of and Scope of Recognition for revision or other action, should it be requested to do so by the P25 CAP Laboratory Program Manager or become unable to conform to any of these conditions.

In addition to the confidentiality provisions of NIST Handbook 153 paragraph 1.6, NIST, and the laboratory seeking recognition acknowledge and agree that the recognition assessments are done in accordance with the authority granted to NIST by Title 15 United States Code Section 3710a. The Parties further agree that to the extent permitted by law, NIST will protect information obtained during application, on-site assessment, evaluation, and recognition from disclosure pursuant to Title 15 USC 3710a(c)(7)(A) and (7)(B) for a period of five (5) years after it is obtained. For the first five years that laboratory information is held by NIST, both confidentiality provisions will be in force — NIST Handbook 153 and 15 USC 3710a. Information in NIST's possession for more than five years will continue to be held in confidence under the provision of NIST Handbook 153.

As the applicant laboratory's **Authorized Representative**, I agree to the above conditions for recognition. I attest that all statements made in this application are correct to the best of my knowledge and are made in good faith.

_____	_____	_____
Signature	Date	Printed Name

NOTE: This questionnaire contains collection of information requirements subject to the Paperwork Reduction Act (PRA). Notwithstanding any other provisions of the law, no person is required to respond to, nor shall any person be subject to penalty for failure to comply with, a collection of information subject to the requirements of the PRA, unless that collection of information displays a currently valid Office of Management and Budget (OMB) Control Number. The estimated response time for this questionnaire is 60 minutes. The response time includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this estimate or any other aspects of this collection of information, including suggestions for reducing the length of this questionnaire, to the National Institute of Standards and Technology, Attn., P25 CAP Laboratory Program Manager, p25-cap-lpm@nist.gov, 301-975-6061. The OMB Control No. is 0693-0053, which expires on August 31, 2011.