

FACT SHEET

ACCEPTANCE OF TEST DATA FOR ELECTROMAGNETIC COMPATIBILITY FOR INFORMATION TECHNOLOGY EQUIPMENT BETWEEN THE UNITED STATES OF AMERICA AND JAPAN

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Q: What arrangement has been made for the acceptance of test data for Electromagnetic Compatibility (EMC) for Information Technology (IT) Equipment between the U.S. and Japan?

A: Based on an exchange of letters between the United States Trade Representative (USTR) and the Government of Japan, the FCC will accept test results for IT Equipment¹ from accredited Japanese laboratories who are in compliance with ISO/IEC 17025 and specific FCC requirements. The Voluntary Control Council for Interference by Information Technology Equipment (VCCI), a private-sector Japanese organization, will accept test results for IT Equipment² from accredited U.S. laboratories who are in compliance with ISO/IEC 17025 and specific VCCI requirements.

Q: Who can participate under the arrangement? What is the scope?

A: VCCI will accept the Registration of Product Conformity, as defined in Article 9 of VCCI Rules for Voluntary Control Measure (VCCI Rules), for IT Equipment as defined in Article 4 of the VCCI Rules, based on test reports from an accredited test lab in the U.S. provided the following requirements are met:

1. U.S. suppliers are VCCI regular members;
2. U.S. suppliers submit the results of conformity assessment procedures to VCCI in accordance with VCCI Rules for conformity verification reporting;
3. U.S. test labs are accredited to ISO/IEC 17025 and relevant VCCI requirements by a U.S. accreditation body;
4. The U.S. accreditation body is a signatory to the Asia-Pacific Laboratory Accreditation Cooperation (APLAC) MRA or equivalent;
5. U.S. test labs are regular or supporting members of VCCI and pay the applicable membership fees; and
6. U.S. test labs are required to register with VCCI through a recognized U.S. accreditation body as outlined below. (Note: such registration will not incur fees.)

¹ IT Equipment comprises a subset of Unintentional Radiators

² Neither Unintentional Radiators (with the exception of IT Equipment) nor ISM Equipment are subject to VCCI requirements for EMC

The application for New/Renewal Registration of Measurement Facility is available on the VCCI website at http://www.vcci.or.jp/vcci_e/index.html.

In turn, the FCC will accept a Declaration of Conformity (DoC), as defined in 47 CFR, Part 2.906, for EMC with respect to Unintentional Radiators and Industrial, Scientific, and Medical Equipment (ISM), as defined in 47 CFR, Parts 15.3(z) and 18.107 (c), based on test reports from an accredited Japanese test lab provided the following requirements are met:

1. the DoC attests that the Unintentional Radiator or ISM Equipment meets relevant FCC requirements;
2. the test lab is accredited to ISO/IEC Standard 17025 and relevant FCC requirements by an accreditation body that meets ISO/IEC 17011; and
3. the test lab is designated and listed in the FCC Database based on the procedures specified in the exchange of letters.

Q: When and how will this arrangement be implemented?

A: The arrangement was effective on April 1, 2007.

U.S. test labs must register with VCCI through the [National Voluntary Laboratory Accreditation Program \(NVLAP\)](#)³ or the [American Association of Laboratory Accreditation \(A2LA\)](#)⁴, and must meet all of the VCCI requirements listed above. U.S. test labs are not required to be designated directly by the National Institute of Standards and Technology (NIST).

In Japan, the Ministry of Internal Affairs and Communications (MIC) is responsible for designating Japanese labs and listing them in the FCC Database. The American Association of Laboratory Accreditation (A2LA) and the NIST National Voluntary Laboratory Accreditation Program (NVLAP) may continue to accredit Japanese test labs but will no longer be responsible for entering these test labs into the FCC Database.

Q: Who will benefit from this Exchange of Letters?

A: Both U.S. and Japanese manufacturers of IT Equipment will benefit by having reduced expenses and shorter processing times to export their products to each others' markets. This is particularly helpful for small and medium enterprises (SMEs) who may not have a presence in the export market, but whose innovative technology is in high demand. Independent EMC test labs, designated under the arrangement, will be able to offer conformity assessment services under the provisions of the arrangement.

³ At NVLAP, contact Brad Moore at (301) 975-4016 or brad.moore@nist.gov.

⁴ At A2LA, contact Bethany Hackett at (301) 644-3248 or bhackett@a2la.org.