

P25 CAP Comment Feedback Table for Proposed Changes to
P25-CAB-TEST_REQ REVISED Draft v1.6

Document Title: 20211108 P25-CAB-TEST_REQ REVISED Draft v1.6

Review Comments were requested due: Wednesday December 15, 2021

Consolidated View of All Comments Received

Commenters:

- Compliance Testing, LLC (CT)
- L3Harris (L3-H)
- Motorola Solutions, Inc. (MSI)

#	Section, Comment	Action	Resolution, Notes
L3-H #1	<p>General Comment:</p> <p>It would be very helpful if P25 CAP would adopt a future process of including a tracked-changes version of new CAB revision drafts showing all the specific changes from the prior version. This would help those of us who attempt to provide a detailed review and meaningful feedback on the changes and would help those of us who attempt to provide a detailed review and meaningful feedback on the changes and would ensure none are overlooked during review.</p>	Noted	When we send out a new version for comment, we will implement this in the future by sending both a track changes version of the draft, and a clean version of the draft.
MSI #1	<p>Section 1.1</p> <p>First sentence states: <i>"Federal Grant Guidance states that grant applicants using funds to purchase P25 equipment must obtain SDOC and STR documents posted to the dhs.gov/science-and-technology/p25-cap website."</i></p> <p>We could not find this (must) language in the latest version of the SAFECOM document (FY 2021 SAFECOM Guidance_Final_508.pdf).</p> <p>Please provide a reference or consider rewording to accurately reflect the language in the SAFECOM document.</p>	Answered	Section 1.1 has been updated to reflect the current SAFECOM Guidance language.

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L3-H #2	<p>Section 1.3 Normative References:</p> <p>References [5] and [6] refer to the requirements (and instructions) CABs for SDOCs and STRs. At one point there was some discussion from Cynthia Cole about possibly eliminating these documents through consolidation with the templates or other means. Currently there is a footnote on the references instructing the reader to see the latest versions of the CABs on the DHS website, so if these CABs will be kept and updated to match the new format of the SDOCs and STRs, then these references appear to remain valid. But if these CABs are to be eliminated instead of revised for the new format, we suggest they be removed from section 1.3 during this revision.</p>	Answered	<p>Discussion of the status of these two documents covering <i>Supplier's Declaration of Compliance</i> (SDOC) <i>Requirements</i> [5] and <i>Summary Test Report</i> (STR) <i>Requirements</i> [6] is ongoing. The subject documents will either be revised to conform or will be eliminated.</p> <p>If we eliminate the two documents we will make an editorial correction to this document.</p>

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CT #1a	<p>Section 2 SAFECOM Grant Language</p> <p><i>“Grantees will, at a minimum, ensure the vendors has participated in equipment testing ...”</i> We propose “has participated in equipment testing” to be defined as the product has passed P25 CAP testing requirements at an accredited lab. What level of testing is required to be considered “participated in equipment testing”? Do all products and features need to be tested or only the products that the vendor would like to have posted on the DHS website? Who qualifies as the “vendor”? Is it the final “end seller” or a systems integrator or an original equipment manufacturer or a manufacturer that creates subsets of functions within a P25 product? Who must post the DTRs? The goal is to ensure that the device continues to meet P25 CAP requirements <u>following firmware changes</u> and or <u>component changes</u>.</p>	Answered	We have revised Section 2 to reflect current SAFECOM Guidance.
#1b	Is there a formal policy for Manufacturers to update their SDOC when making component or software changes?	Answered	The Manufacturers are aware that they need to update their STRs when changes are made affecting compliance with existing model classes. Any change in software must be reflected in an updated Statement of Commonality, which would revise the STR. The relevant SDOC is not impacted.

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CT #2	<p>Section 4.1</p> <p><i>“Participating manufacturers shall refresh their company/product data once per year.”</i></p> <p><i>“Participating manufacturers shall “Device Changes refresh” their company/product data once per year.”</i> “Device Changes Refresh” would be defined to test the device to P25 CAP standards at an accredited lab if <u>firmware</u> or <u>component changes</u> were made to the device to ensure the device continues to meet the P25 CAP requirements following the changes.</p> <p>These product updates may include a release of new software. Is new software allowed to include features that may not have been tested or marked as supported in previous DTRs? How does this apply to newly advertised features that may be marked as unsupported in the existing DTR?</p> <p>Proposed changes require retesting if “both” hardware and software changes are made? Does “software” refer to the “P25 Stack” or “firmware”?</p>	Answered	<p>Participating manufacturers in the program are being instructed that they need to maintain contact with the P25 CAP program office, and being provided a number of ways to achieve this.</p> <p>The P25 CAP Program Office has experienced the problem of manufacturers changing names, contact information, or ownership resulting in our not being able to provide accurate information to potential users of the program’s information.</p> <p>Changes that are not covered on the list in Section 5.3.1 require a new submission of documents for approval.</p>

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MSI #2	<p>Section 4.1 (continued)</p> <p>Regarding the list of actions which “qualify as the required information refresh:”</p> <p>Questions to confirm understanding:</p> <ol style="list-style-type: none"> 1. Once this document is published, that initiates the first 12 month clock, true? 2. Submission of any of the bulleted items restarts the 12 month clock, true? 3. Note that a manufacturer is allowed to have single or multiple SDoC/STRs for CAI submissions (Trunked/Conventional, FDMA/TDMA, Performance/Interoperability). If there are multiple SDOCs/STRs, the 12 month clock applies to each document, true? 	Answered	<ol style="list-style-type: none"> 1. The first 12 month period starts as of the effective date of this document. 2. Yes. Submission of an item will be noted and will reset the 12 month clock. 3. The 12 month clock applies to the manufacturer, not to a particular document. Submission of any of the items counts for all of the items.
MSI #3	<p>The list of actions includes: “<i>Notification of a release of new software, with an update to the applicable Statement of Software Commonality.</i>”</p> <p>The Statement of Software Commonality document is also mentioned in section 5.3.1.</p> <p>We believe that Statements of Software Commonality attest that an engineering evaluation has concluded that software or hardware revision does not impact previous test results.</p> <p>Since this document mentions Statements of Software Commonality (SoSC) in multiple places, does this mean that SoSCs are documents that are to be submitted to CAP?</p> <p>If so, where is this documented?</p> <p>If so, where is the template and requirements for an SoSC format and content? These are necessary to ensure a consistent set of information is submitted and consistent interpretations of the information are made</p>	Answered	<p>Correct. The Statement of Software Commonality (SOSC) is a statement that an engineering evaluation has concluded that the submitted software revision does not impact previous test results. It is inserted into the STR in the space provided in the template.</p> <p>Information regarding the SOSC is included in the STR template.</p>

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L3-H #3	<p>Section 5.3 (continued)</p> <p>Recommend changing “...meet current P25 CAP and TIA Standards (including test case versions)...” to “...meet currently prescribed TIA standards (including test case versions)...”. The P25 requirements CABs prescribe precisely which version of TIA standards documents shall be used under the program at any given time. This precludes the use of any more current versions of those documents that may be published by the TIA before the P25 CAP has reviewed and adopted the new versions into its program requirements. This is a minor detail of the wording, but our suggested edit here seeks to avoid any potential confusion. (Our comment here assumes that this draft wording was not an intentional signal that DHS will be president in the rules of the program to start using “latest published version” TIA documents.</p>	Agree	The recommendation has been incorporated.
MSI #5	<p>First paragraph: “To ensure that P25 devices listed on the DHS Approved (Grant-Eligible) Equipment Page ... P25 CAI devices will require updated SDOCs and STRs by DECEMBER 31, 2022 ...”</p> <p>By “P25 CAI devices” are you referring to all currently posted (Approved) P25 CAI devices?</p>	Answered	Yes. Any currently posted SDOC / STR that is more than the stated four-year or five-year age as of August 31, 2024 will need to be updated before August 31, 2024.
MSI #6	<p>First paragraph: Please explain how this requirement and the December 31, 2022 deadline interact with the “once every 12 months” requirement and the qualifying refresh items listed in section 4.1. For instance, does the first 12 month clock start on December 31, 2022 and then every 12 months a refresh item is to be submitted?</p>	Answered	P25CAP needs to hear from each manufacturer at least one every 12 months. Submission of <u>any</u> item on the list in Section 4.1 will meet the 12 month requirement.

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	Section 5.3 (continued)		
MSI #7	Second Paragraph: Regarding the second paragraph, does this apply only to new submissions made after January 1, 2023?	Answered	No. All items on the Approved List must have data on file that is within the stated window (four year or five year) to ensure that current TIA test documents are complied with.
MSI #8	Second Paragraph: This paragraph appears to put an expiration date on DTRs. Does this imply that going forward, DTRs (with creation dates) are to be submitted to CAP along with the corresponding STRs? This should be documented and DTR templates/requirement documents should be published to ensure consistent interpretations and validations of submitted documents.	Answered	The second paragraph covers new submissions of SDOCs and STRs. (Existing SDOCs and STRs shall be updated to the new formats by September 1, 2024, with supporting DTRs for equipment items needing to be retested being grandfathered until August 31, 2024, to allow time for the retesting.) We will ask for DTRs when we need to check them against the STR submitted to verify. The DTR data will not be published. The P25 CAP does not provide DTR formats. P25 CAP recognized Testing Labs are in the best position to develop detailed test reports documenting the information required to meet ISO and TIA standards.

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L3-H #5	<p>Section 5.3.1, Second bullet:</p> <p>The intent of the statement “<i>New platform release requiring both new hardware and software</i>” is unclear to us. The assumed intent would be that anytime a new product is released that is not covered by an existing Interoperability Model Class, meaning that it has interoperability test results that are potentially different than those of a currently declared compliant model class, it must be tested for interoperability. This could be due to differences in either the new product’s hardware <i>or</i> software. It seems the statement should not require “both hardware and software” be new to trigger a retest.</p>	Agree	Revised to read “Release of a new product that is not covered by an existing Interoperability Model Class”

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L3-H #6	<p>Section 5.3, Last sentence and footnote 4:</p> <p>Regarding the new rules of enforcement for the CAI Interoperability “rule of three”, as we currently understand them, if a manufacturer’s product falls from 3 or more valid DTRs to less than three, that product’s SDOC will be removed from the compliance equipment list. However, due to the way the program has expanded over the last five years, much of the various required testing was done at different times and thus the DTRs containing those results will expire at different times. For example, if I have a product that on a certain date has enough of its FDMA trunked results expire to drop below three valid DTRs, but still has 3 or more valid DTRs for TDMA trunked testing, what happens to that product’s SDoC posting status? Note that per the current P25 CAP rules, there is only a small subset of P25 Conventional features/functionality that are defined in the minimum feature requirements for CAI products to have their SDoC posted (see P25-CAB-MIN-FEATURE_REQ-November 2017).</p>	Answered	In this case (the listing no longer meets the Rule of Three) the Manufacturer will need to go back and test to bring both FDMA and TDMA documentation current.

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L3-H #7	<p>Sections 6.2 and 6.3</p> <p>These sections refer to SDOC and STR documents specific to each type of ISSI testing. Does DHS intend to maintain Conformance and Interoperability documents separately for each product declared? In the past we have pointed out that this approach seems counterintuitive because an SDOC is not particular to certain test results, but rather is particular to a product model or family being declared compliant. It would seem to make more sense to have one SDOC that is submitted when all required test types have been successfully completed, with an accompanying STR that includes the results for all the various testing types. This is in line with how CAI Performance and Interoperability testing has been handled since the inception of the CAP program. It was our understanding that P25 CAP intended to consolidate the ISSI testing and reporting, in which case, the language here may need revising.</p>	Answered	<p>We require a single SDOC for each piece of equipment. As we are not ready to evaluate Conformance, the SDOC will initially cover the Interoperability tests. Once we have established Conformance standards, we will come back to the Manufactures and request Conformance testing under a separate STR, consolidated into a revised SDOC.</p>
MSI #9	<p>Both sections require SDOC and STR submission. ISSI/CSSI Conformance and Interoperability SDOC and STR templates do not appear on the CAP website. We propose these requirements should not go into effect until there are published templates.</p>	Answered	<p>See above.</p>

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MSI #10	<p>Sections 6.2 and 6.3 (Continued)</p> <p>Can you share the process for template development?</p> <ul style="list-style-type: none"> • Time cycle for template refresh (updates)? • Mechanism for public review? • Allowance for manufacturer submissions made in the midst of a new template development cycle? 	Answered	See the response to MSI Comment #4 on Page #6 of this document.

END OF COMMENTS