Homeland Security

Science and Technology

Office for Interoperability and Compatibility

Project 25 Compliance Assessment Bulletin

Project 25 Compliance Assessment Program

Baseline Laboratory Requirements

P25-CAB-LAB_BASE_REQ

August 2016

Notice of Disclaimer and Limitation of Liability

The Project 25 Compliance Assessment Program (P25 CAP) provides equipment purchasers with 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. Although successful tests will demonstrate P25 compliance for the specific requirements tested, the conclusions drawn from these tests do not apply to every environment or individual user's needs. 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
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Draft 2 (For PC)	6/30/2015	Incorporates public comment-resolution candidates. Posted again for PC the week of June 30, 2015.
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1 Introduction

The Department of Homeland Security (DHS) Office for Interoperability and Compatibility (OIC) 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 purchase 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 DHS-recognized P25 CAP laboratories. All equipment suppliers that participate in the P25 CAP must use recognized laboratories to conduct performance, conformance and interoperability tests on their products. P25 equipment suppliers will release Summary Test Report (STR) and Supplier's Declaration of Compliance (SDOC) documents based on the Detailed Test Report (DTR) from the DHS-recognized laboratory(s) that performed the product testing. This documentation will serve to increase the public's confidence in the performance, conformance and interoperability of P25 equipment.

1.1 Scope

This Compliance Assessment Bulletin identifies accreditation and recognition requirements for becoming a DHS-recognized laboratory for P25 CAP testing.

1.2 Effective Date

This Compliance Assessment Bulletin becomes effective on August 8, 2016.

1.3 Normative References

[1] ISO/IEC 17011: 2004, *Conformity assessment — General requirements for accreditation bodies accrediting conformity assessment bodies.*

[2] ISO/IEC 17025:2005, *General requirements for the competence of testing and calibration laboratories.*

[3] ISO/IEC 17050-1:2004, *Conformity assessment — Supplier's declaration of conformity — Part 1 General requirements.*

[4] ISO/IEC 17050-2:2004, *Conformity assessment — Supplier's declaration of conformity — Part 2 Supporting documentation.*

1.4 Informative References

[5] P25-CAB-LAB_EQP_REQ, Project 25 Compliance Assessment Program Laboratory Equipment Requirements.[1]

[6] P25-CAB-LAB_REC_AGREEMENT, *Project 25 Compliance Assessment Program Laboratory Recognition Conditions and Criteria Agreement*.[1]

[1] See https://www.dhs.gov/science-and-technology/p25-cap for the latest document version.

[7] P25-CAB-STR_REQ, *Project 25 Compliance Assessment Program Summary Test Report Requirements*.[1]

[8] P25-CAB-SDOC_REQ, *Project 25 Compliance Assessment Program Supplier's Declaration of Compliance Requirements*.[1]

[9] *Charter for the Project 25 Compliance Assessment Program*.[1]

1.5 Terms and Definitions

1.5.1 Accreditation Body

(Specific to the P25 CAP.) An authoritative body complying with ISO/IEC 17011 that assesses and accredits a laboratory against standards and requirements. An accreditation body is authorized by DHS to assess laboratory competence to conduct all of the test cases or a subset of test cases defined in the applicable Compliance Assessment Bulletins. The accreditation process ensures the acceptability of a laboratory's P25 CAP testing practices.

1.5.2 Authorized Representative

An individual who is authorized to commit a laboratory to fulfill the P25 Compliance Assessment Program's conditions for recognition. The person identified as the laboratory's authorized representative and signs the Laboratory Recognition Conditions and Criteria Agreement [6] must be the same authorized representative on file with the laboratory's DHS-authorized accreditation body.

1.5.3 Certificate of Accreditation

A document or online certification issued by a DHS-authorized accreditation body to a laboratory that has demonstrated competence to conduct a particular Scope of Accreditation of testing. This scope represents all of the test cases or a subset of test cases defined in one or more Compliance Assessment Bulletins. Scope of Accreditation may be identified in an addendum to the Certificate of Accreditation.

1.5.4 Certificate of Recognition

A document issued online by DHS to identify a laboratory that, according to a DHS-authorized accreditation body, has demonstrated competence to conduct a particular Scope of Accreditation of testing. This scope represents all of the test cases or a subset of test cases defined in one or more Compliance Assessment Bulletins. A list of DHS-recognized P25 CAP laboratories and the online Certificate of Recognition for each is available at the dhs.gov/science-and-technology/p25-cap website.

1.5.5 Compliance Assessment Bulletin

Published by DHS, a Compliance Assessment Bulletin contains the policies and procedures by which the P25 CAP operates. The scope of a Compliance Assessment Bulletin can range from P25 CAP policy to guidance, covering issues such as specific test methods to use for a particular P25 interface or guidelines for the creation of a Supplier's Declaration of Compliance (SDOC) and Summary Test Report (STR) documents.

1.5.6 Equipment Supplier

The Original Equipment Manufacturer (OEM) or an authorized agent of the OEM.

1.5.7 Laboratory Code

A unique identifier for program management assigned to each laboratory participating in the P25 CAP.

1.5.8 P25 Compliance Test Method

A normative test procedure defined for compliance testing of a given interface. These test procedures are typically broken down into the following categories:

a) Performance (e.g., measurement methods and performance recommendations);

b) Conformance; and

c) Interoperability.

The test methods used in the P25 CAP are chosen from P25-approved standards that are customarily drawn from the TIA-102[2] suite of standards. The intention is for the suite to contain performance, conformance and interoperability test standards for each interface or major service. Each test standard contains a variety of test methods. Many, but not all, of these test methods will be included in the minimal set of tests required for compliance demonstration in the P25 CAP.

1.5.9 Scope of Accreditation

The type of testing for which a laboratory demonstrates competence. The Compliance Assessment Bulletins published by DHS contain the particular test methods. The Scope of Accreditation lists the actual test methods for which the laboratory demonstrated competency.

NOTE: The Scope of Accreditation need not include all of the test methods contained in the aforementioned Compliance Assessment Bulletins; a laboratory can be accredited for a subset of test methods.

1.5.10 Summary Test Report (STR)

A report summarizing the results of a particular set of P25 Compliance Test Methods defined within the relevant Compliance Assessment Bulletins. Suppliers submit STRs along with Supplier's Declaration of Compliance (SDOC) documents by email to P25CAP@hq.dhs.gov for DHS review and approval of eligibility for grant procurement. Once approved, STRs can be viewed publicly with their associated SDOC documents at the dhs.gov/science-and-technology/p25-cap website. More information on the STR is contained in P25-CAB-STR_REQ [7].

[2] The Telecommunications Industry Association (TIA) refers to the P25 suite of standards as, "TIA-102 Land Mobile Communications Standards (APCO/Project 25)."

1.5.11 Supplier's Declaration of Compliance (SDOC)

A formal declaration of compliance created in accordance with ISO/IEC 17050 for a particular set of P25 Compliance Test Methods defined within the relevant Compliance Assessment Bulletins. An authorized representative of the Equipment Supplier signs the SDOC. More information on the SDOC is contained in P25-CAB-SDOC_REQ [8].

1.5.12 Telecommunications Systems Bulletin (TSB)

The Telecommunications Industry Association (TIA) publishes TSBs. A TSB is not a standard, but rather contains technical material that may be valuable to industry and users.

1.5.13 Test Case

A particular section that defines a unique test procedure within a compliance test methods document.

1.6 Outline of the P25 Compliance Assessment Program

1.6.1 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 DHS-authorized accreditation bodies and promotes the acceptance of compliant test results from these laboratories.

NOTE: Throughout this bulletin: a) *Accreditation* refers to laboratory approval by DHS-authorized accreditation bodies that follow their own policies and procedures to assess, according to ISO/IEC standards, laboratory competence to conduct a particular scope of P25 CAP testing; b) *Recognition* refers to DHS identification of a lab accredited for P25 CAP testing.[3]

1.6.2 DHS established the P25 CAP on the basis of requests from the United States Congress.[4] The Compliance Assessment Bulletins published by DHS define specific tests, types of tests and standards to be included in the program. DHS OIC manages the laboratory recognition part of the program.

1.6.3 DHS 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 or on its membership in any association or group, nor is it conditioned upon 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 federal, state and local government laboratories.

[3] See Sections 1.5.3, 1.5.4 and 1.5.9 for more information about accreditation, recognition and Scope of Accreditation, respectively.

[4] Senate Report 109-088 - DEPARTMENTS OF COMMERCE AND JUSTICE, SCIENCE, AND RELATED AGENCIES APPROPRIATIONS BILL, 2006 and House Report 109-241 - MAKING APPROPRIATIONS FOR THE DEPARTMENT OF HOMELAND SECURITY FOR THE FISCAL YEAR ENDING SEPTEMBER 30, 2006, AND FOR OTHER PURPOSES.

1.6.4 P25 CAP laboratory recognition is based on accreditation by a DHS-authorized accreditation body, which assesses 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 demonstrates that it has met all P25 CAP laboratory requirements in this Compliance Assessment Bulletin. A DHS-recognized laboratory receives a Certificate of Accreditation and addendum (if necessary) identifying the Scope of Accreditation of testing by a DHS-authorized accreditation body. DHS also issues a Certificate of Recognition, which details the specific test methods, measurements and services in a particular Scope of Accreditation of testing for which a laboratory has been accredited. DHS only recognizes laboratories that have been accredited by a DHS-authorized accreditation body. DHS may independently assess the application package provided to the accreditation body and is not bound by the accreditation body's recommendation, however.

1.6.5 P25 CAP laboratory recognition does not relieve a laboratory from complying with applicable federal, state and local laws and regulations.

1.6.6 Equipment suppliers who participate in the voluntary P25 CAP test their products at a DHS-recognized P25 CAP laboratory to formally demonstrate compliance with a select group of P25 compliance test methods. Those who participate submit SDOC and STR documents by email to P25CAP@hq.dhs.gov for DHS review and approval of eligibility for grant procurement.

1.6.7 Once approved, SDOC documents and associated STR documents can be viewed publicly at the dhs.gov/science-and-technology/p25-cap website.

1.7 Outline of Laboratory Recognition Process

The process for participation in the P25 CAP as a DHS-recognized laboratory involves the following steps:

a) The laboratory seeking recognition submits an application for P25 CAP accreditation in accordance with the policies of the DHS-authorized accreditation body the laboratory selects (Section 2.1).

b) Having demonstrated competence to conduct a particular Scope of Accreditation of testing–that is, all of the test cases or a subset of test cases defined in the applicable Compliance Assessment Bulletins–the accreditation body issues the laboratory a Certificate of Accreditation and addendum (if necessary) identifying the Scope of Accreditation of testing (Section 2.3).

c) The laboratory sends a web link to, or forwards a copy of, the current Certificate of Accreditation and addendum (if necessary) identifying the Scope of Accreditation of testing to DHS for consideration of the laboratory for P25 CAP recognition together with a signed P25 CAP Laboratory Recognition Agreement [6] (Section 3.1).

d) Having earned P25 CAP accreditation to conduct a particular Scope of Accreditation of testing from a DHS-authorized accreditation body, DHS issues the laboratory a Certificate of Recognition (Section 3.2.3).

1.8 Confidentiality

1.8.1 To the extent permitted by applicable laws, the P25 CAP will protect the confidentiality of all information obtained relating to the application, on-site assessment, evaluation and recognition of laboratories.

1.8.2 For the first five years that laboratory information is held by the P25 CAP, the provisions of Section 1.8.1 will be in force. Information in the P25 CAP's possession for more than five years will continue to be held in confidence under the provisions of Section 1.8.1.

1.9 Complaints

DHS will document the system used to address complaints, which will include the procedures for determining the validity of complaints, taking appropriate and effective actions, responding to complainants, and maintaining records. Any person or organization may lodge a complaint regarding the activities of the P25 CAP or of a DHS-recognized P25 CAP laboratory. Written information and available supporting documentation about the complaint shall be mailed, faxed or emailed to DHS and the accreditation body if related to laboratory assessments, or to DHS if related to laboratory recognition status. A complaint concerning a DHS-recognized P25 CAP laboratory shall first be submitted to the laboratory against which the complaint is lodged.

2 Accreditation Requirements for Laboratories

The first step in obtaining recognition as a P25 CAP testing laboratory is accreditation in accordance with the polices of the DHS-authorized accreditation body the laboratory selects.

2.1 Application for P25 CAP Accreditation

2.1.1 To initiate the P25 CAP laboratory accreditation process, the applicant laboratory shall select a DHS-authorized accreditation body to receive the submission requirements necessary to launch an on-site assessment. A list of DHS-authorized accreditation bodies is available at the dhs.gov/science-and-technology/p25-cap website.

2.1.2 Accreditation fees are administered in accordance with the policies of the accreditation body.

2.2 Assessment Records

The assessment records will consist of evaluations of the quality system (in accordance with the applicable provisions of this Compliance Assessment Bulletin) and of the technical assessment components. The technical assessment components will be contained in assessment records that detail which tests were observed, what equipment was used and the staff members that conducted the tests. In addition, an assessment report will contain a listing of any observed nonconformities.

The assessment report and supporting assessment records (where relevant) will include as a minimum:

a) The dates of assessment;

b) The names of the assessors responsible for the report;

c) The names and addresses of all the laboratory sites assessed;

d) The assessed Scope of Accreditation (see Section 2.3); and

e) Comments and nonconformities cited by the assessors on the compliance of the laboratory with the accreditation requirements.

2.2.1.1 The accreditation body will send a copy of the Assessment Report and supporting assessment records (where relevant) to the laboratory within 15 business days following the completion of the assessment.

2.2.2 After correcting any nonconformities, the laboratory will forward a copy of the accreditation body's final assessment records to DHS within five business days of receiving it from the accreditation body.

2.2.2.1 The accreditation body maintains responsibility for the content of the assessment records, including the statement of any nonconformities, and will supply any requested records to DHS within five business days of the request.

2.3 Scope of Accreditation

2.3.1 A Scope of Accreditation shall identify the type of testing for which a laboratory demonstrates competence. The Compliance Assessment Bulletins published by DHS contain the particular test methods. The Scope of Accreditation will list the actual test methods for which the laboratory demonstrates competency.

NOTE: The Scope of Accreditation need not include all of the test methods contained in the aforementioned Compliance Assessment Bulletins; a laboratory can be accredited for a subset of test methods.

2.3.2 When a laboratory demonstrates competence to conduct a particular Scope of Accreditation of testing, the accreditation body shall issue the laboratory a Certificate of Accreditation and addendum (if necessary) identifying the Scope of Accreditation of testing within 15 business days following a positive decision to grant accreditation.

2.3.3 The laboratory will send a web link to, or forward a copy of, the current Certificate of Accreditation and addendum (if necessary) identifying the Scope of Accreditation of testing to DHS (see Section 3.1) within five business days of receiving it from the accreditation body.

2.4 Changes to Scope of Accreditation

2.4.1 A laboratory's Scope of Accreditation may be expanded to include additional performance, conformance or interoperability Compliance Test Methods, including methods for additional P25 standard interfaces without the need for an immediate on-site assessment. If the laboratory requests additions to its Scope of Accreditation, it must meet all the requirements defined in the applicable Compliance Assessment Bulletins for which accreditation is sought.

2.4.2 Laboratories may also request to reduce their Scope of Accreditation.

2.4.3 Changes to Scope of Accreditation are administered in accordance with the policies of the accreditation body.

2.4.4 When a change to the Scope of Accreditation is granted, the accreditation body will provide the laboratory a revised Certificate of Accreditation or addendum (if necessary) reflective of the revised Scope of Accreditation. The provisions of Section 2.3 will apply.

2.4.5 Changes to Scope of Accreditation shall result in DHS issuing a revised Certificate of Recognition to the laboratory (see Section 3.2.3).

3 Recognition Requirements for Laboratories

3.1 Agreement and Accreditation Document Submission

Once the laboratory receives a Certificate of Accreditation, the laboratory shall provide the following documents to DHS for P25 CAP recognition consideration:

a) A signed P25 CAP Laboratory Recognition Agreement [6] (download, sign and scan, or execute electronic signature).

b) A copy of the current Certificate of Accreditation and addendum (if necessary) identifying the Scope of Accreditation of testing (Section 2.3.3).

Documents shall be sent as attachments or web links to DHS at: P25CAP@hq.dhs.gov.

3.2 Granting Recognition

3.2.1 The P25 CAP may appoint a committee to assist in the decisions required for all actions related to granting, renewing, suspending and withdrawing any P25 CAP recognition.

3.2.2 Recognition is granted when a laboratory has met all DHS P25 CAP requirements described in this Compliance Assessment Bulletin. The renewal period is based on the date of initial assessment and the accreditation body's assessment cycle (see Section 3.3).

3.2.3 When recognition is granted, DHS will provide the laboratory a Certificate of Recognition identified by its Laboratory Code, which includes:

a) The recognized laboratory's name and address;

b) The Scope of the Accreditation listing the test methods for which the laboratory demonstrated competence;

c) The laboratory's authorized representative; and

d) The effective dates of the recognition.

3.3 Renewal of Recognition

3.3.1 Renewal of DHS-recognition shall align with the accreditation cycle of the laboratory's accreditation body, which occurs approximately every two to three years based on the date of initial assessment and the accreditation body's assessment cycle.

3.3.2 On-site assessments of currently recognized laboratories shall be performed as part of the accreditation body's assessment cycle. DHS-recognition renewal corresponds to accreditation at the discretion of DHS in accordance with Section 3.2.

3.4 Voluntary Termination of Recognition

3.4.1 A laboratory may at any time terminate its P25 CAP participation and responsibilities as a recognized laboratory by advising DHS in writing of its desire to do so.

3.4.2 Upon receipt of a request for termination, DHS will terminate the laboratory's P25 CAP recognition, notify the laboratory that its recognition has been terminated, remove the laboratory from the online DHS-recognized laboratory listing, and instruct the laboratory to remove references to the P25 CAP from all subsequent test reports, correspondence and advertising.

3.4.3 A laboratory whose recognition has been terminated shall not reference P25 CAP recognition on its test or calibration reports, correspondence and advertising.

3.4.4 A laboratory whose recognition has been voluntarily terminated may reapply per Section 2.1.

3.5 Suspension of Recognition

3.5.1 Suspension of a laboratory's accreditation by its accreditation body automatically results in a suspension of P25 CAP recognition.

3.5.2 If a laboratory's accreditation is suspended, the accreditation body notifies DHS and the laboratory of that action, stating the reasons for and conditions of the suspension and specifying the actions the laboratory shall take to have its accreditation reinstated in accordance with the policies of the accreditation body.

3.5.3 A laboratory whose accreditation and recognition has been suspended shall not reference P25 CAP recognition on its test or calibration reports, correspondence and advertising during the suspension period in the areas affected by the suspension. DHS will remove a suspended laboratory from the online DHS-recognized laboratory listing.

3.5.4 During the suspension period, test reports generated by the laboratory shall not be used to substantiate a Supplier's Declaration of Compliance for any products.

3.5.5 Recognition of a suspended laboratory may be reinstated by satisfactorily addressing the accreditation concerns raised by the accreditation body in accordance with the policies of the accreditation body. In addition, the provisions of Section 2.3 will apply. When recognition is reinstated, DHS will authorize the laboratory to resume testing activities in the previously suspended areas as a recognized laboratory and will return the laboratory to the online DHS-recognized laboratory listing.

3.6 Withdrawal of Recognition

3.6.1 A laboratory that has had its accreditation or recognition suspended for more than six months may be considered for withdrawal. If DHS proposes to withdraw recognition of a laboratory, DHS will inform the laboratory of the reasons for the proposed withdrawal and the procedure for appealing such a decision. Withdrawal can be for all or part of a laboratory's Scope of Accreditation.

3.6.2 The laboratory has 30 days from the date of receipt of the proposed withdrawal letter to appeal the decision. If the laboratory appeals the decision (see Section 3.8), the proposed withdrawal will be stayed pending the outcome of the appeal. In the event that the laboratory does not appeal the proposed withdrawal within the 30-day period, the proposed withdrawal will become final through the issuance of a written decision to the laboratory.

3.6.3 If recognition is withdrawn, the laboratory may be given the option of voluntarily terminating the recognition (see Section 3.4).

3.6.4 A laboratory whose recognition has been withdrawn shall have its Certificate of Recognition removed from the online DHS-recognized laboratory listing and shall cease to reference recognition by the P25 CAP in any of its reports, correspondence or advertising related to the areas affected by the withdrawal.

3.6.5 At DHS's discretion, the laboratory's clients may be required to demonstrate that existing SDOCs are valid. Accordingly, DHS will work with the affected laboratory to identify whether any test cases must be re-run.

3.6.6 If the withdrawal affects only some, but not all of the items listed on a laboratory's Scope of Accreditation, DHS will revise the online Certificate of Recognition listing for the DHS-recognized laboratory to exclude the withdrawn areas, allowing the laboratory to continue operations in recognized areas.

3.7 Reinstatement of Recognition

A laboratory whose recognition has been withdrawn may reapply (using the process described in Section 1.7) and be recognized if the laboratory:

a) Completes the accreditation body accreditation process; and

b) Meets the P25 CAP conditions for recognition.

3.8 Recognition Appeals

3.8.1 A laboratory has the right to appeal any adverse decision made by DHS. Such decisions include refusal to grant recognition; a revised Certificate of Recognition that reflects changes in Scope of Accreditation; decision to suspend or withdraw recognition; and any other action that impedes the attainment or sustainment of recognition.

3.8.2 DHS or a designee will handle appeals of recognition decisions.

3.8.3 An advisory panel of experts selected by DHS may be called to address appeals of a technical nature.

3.8.4 The party assigned to handle the appeal decides on the validity of the appeal and, if appropriate, renders a decision. DHS advises the appellant of the outcome of these deliberations and any recourse for further appeal.

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