



Curtis-Straus Wireless and Energy Efficiency Certification Programs



Certification Services Wireless and Energy Efficiency

Curtis-Straus is a Conformity Assessment Body accepted by the European Commission, Industry Canada, Hong Kong, and Japan Singapore, as a Telecommunications Certification Body by the US Federal Communications Commission and a Recognized Certification Body for ENERGY STAR by the US Environmental Protection Agency. Curtis-Straus is authorized to issue certificates for wireless devices and energy efficient products. These two categories can be classified into specific programs outlined below.

Wireless Devices

Programs under this category include equipment certification for:

Federal Communications Commission (FCC): Title 47 of the Code of Federal Regulations
Innovation, Science and Economic Development Canada (ISED) (formerly Industry Canada):
Spectrum Management and Telecommunications Standards including “Radio Standards
Specifications (RSS)”

Singapore IMDA: IMDA Equipment Registration Framework

Hong Kong OFCA: OFCA Asia-Pacific Economic Cooperation (APEC) Mutual Recognition
Arrangement for Conformity Assessment of Telecommunications Equipment (APEC Tel MRA)

Japan MIC Radio Law: Ministry of Internal Affairs and Communications (MIC)

EU Radio Equipment Directive (RED) 2014/53/EU Notified Body Requirements – Annex III
(Module B) – EU Type Examination

**EU Electromagnetic Compatibility (EMC) Directive 2014/30/EU Notified Body Requirements
Annex III (Part A – Module B) – EU Type Examination**

The program includes selection which includes the evaluation of samples, determination of characteristics by evaluation and testing, initial assessment of the production process and quality system, review and evaluation of the test reports, decision on certification and the licensing to use the mark, on-going surveillance through testing of factory samples.

Energy Efficiency Products

Programs under this category include the Environmental Protection Agency (EPA) ENERGY STAR program and Canada’s Natural Resources Canada (NRCAN) energy efficiency program. The programs include selection which includes the evaluation of samples, determination of characteristics by evaluation and testing, initial assessment of the production process and quality system, review and evaluation of the test reports, decision on certification and the licensing to use the mark, on-going surveillance through testing or inspection of factory samples as well as on-going surveillance of the production process.



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ENERGY STAR Program

Curtis-Straus is an EPA approved and American National standards Institute (ANSI) accredited Certification Body (CB) and provides independent evaluation and certification of electrically-operated products based on EPA Product Specifications. Certification is limited only to products evaluated and reviewed to those standards included in Curtis-Straus' recognition by the EPA and accreditation by ANSI.

NRCAN Program

Curtis-Straus is a SCC Accredited ISO/IEC 17065:2012 Product Certification Body and provides independent evaluation and certification of electrically-operated products based on Canadian standards. Electrical product certification is limited only to products evaluated and reviewed to those standards included in Curtis-Straus' accreditation by SCC. Applicants may process inquiries under the SCC accreditation scope in English and/or French.

Certification Process

Curtis-Straus follows a certification procedure beginning with client contact and ending with a certificate and is maintained through on-going surveillance.

Application Packet Requirements

A complete application packet from the client is required to certify any product. Application packet materials are to be uploaded to our CSUpload system via the Curtis-Straus website. To obtain a user name and password please email certification@curtis-straus.com or request one through the web site.

Certification Agreement

Each applicant must have a certification agreement signed and on file with Curtis-Straus. The agreement can be obtained by contacting our department.

Application Form

The application form will contain information including (but not limited) to the following: manufacturer, applicant name and contact information, product model information, and the specific industry standard requested for certification. Please contact our department for a copy of the application form for the applicable program.

Technical Laboratory Test Report

This is the most important component of the application packet. Test reports must demonstrate that the product to be listed on the certificate complies with all the applicable standards and



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requirements. This test report must be signed and dated by the appropriate authorities of an approved testing laboratory.

Test Reports and Test Data Acceptance for Certification

Test reports and test data acceptance for obtaining FCC certification

Curtis-Straus can only accept test reports for the purpose of certification which have been issued by test firms which are listed in the test firm section of the FCC OET Laboratory Division Equipment Authorization System (EAS) website (<https://apps.fcc.gov/oetcf/eas/reports/TestFirmSearch.cfm>) as being accredited and where the test firm is listed with an appropriate scope for the equipment for which certification is requested.

Test reports and test data acceptance for obtaining ISED (Innovation, Science and Economic Development) Canada certification

Curtis-Straus can only accept test reports for the purpose of certification which have been issued by test firms which are listed on the ISED Canada website as a registered wireless test site (https://sms-sgs.ic.gc.ca/equipmentSearch/searchWirelessTestSites?execution=e1s1&lang=en_CA)

Test reports for the purpose of certification which contain Specific Absorption Rate (SAR) test data can only be accepted by Curtis-Straus where the test firm which performed the SAR measurements and issued the SAR test report is properly registered on the ISED Canada website in the Spectrum Management System section as a registered SAR test firm.

Test reports and test data acceptance for EU Type Examination

Curtis-Straus accepts test reports for the purpose of certification which have been issued by test firms which may, or may not, be accredited by a member of ILAC (<http://www.ilac.org>). However, in those cases where the test firm is not accredited by a member of ILAC, or where the scope of the accreditation does not appear to cover all test data, Curtis-Straus reserves the right to make inquiries about test procedures used, test equipment used, calibration status of test equipment and facilities, etc. where Curtis-Straus deems such inquiries necessary in order to assess the validity of reported test results.

Test reports and test data acceptance for obtaining Singapore IMDA or Hong Kong OFCA certification

Curtis-Straus accepts test reports for the purpose of certification which have been issued by test firms which are accredited by a member of ILAC (<http://www.ilac.org>).

Test reports and test data acceptance for obtaining Radio Law (Japan) certification from the RCB

Curtis-Straus accepts test reports for the purpose of certification which have been issued by test firms which are accredited by a member of ILAC (<http://www.ilac.org>).



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Administrative and Technical Review

After a complete application packet is received, an administrative review and a technical review will be completed prior to certification. Any findings from administration or the technical reviewer will be sent to the email address used to upload the documents.

Certification

Once an application has been deemed acceptable and meeting the specified standard limits and requirements, a certifier will certify the product and a certificate of compliance will be issued. If the specific program also requires listing data to be sent to the appropriate governing body, Curtis-Straus will also submit this data at this time. This data submission will be completed pending client cooperation with data submission compilation efforts.

Evaluation Procedure

When an application is uploaded to our website an email is sent to our team indicating a new application has been submitted. The application is assigned, reviewed for administrative concerns then the reviewing body performs technical review. Any requests for information is sent to the client and given 60 days to respond. Once all information is satisfactory, the application is referred to the Certification Body with the recommendation for Certification. Certification Body reviews application and if satisfactory, grants certification. Curtis-Straus then issues Grant/Certificate to client.

Procedures for granting Certification

The process for granting the use of the mark includes the initial application process, evaluation, initial factory assessment and decision on certification. Authorization to use the mark will be attested in a Certificate and listing letter which together outline the use, rights and obligations of the applicant and Certification Body.

Procedure for Maintaining records, reduction of certification, extending certification

Maintaining Certification

Post market surveillance requirements for Energy Star

EPA percent required of surveillance is determined by product category currently either 5-10% where 50% of models to be tested are selected by the EPA and the remaining 50% are randomly selected by the Certification body.

Surveillance samples shall be typical of production. The samples shall be obtained from the following sources in preferred order: Off-the-shelf (i.e., from the open market); Warehouse (i.e., from a storage depot); or Off-the-line (i.e., from the manufacturing facility). Verification



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Energy Efficiency
Verified

testing shall be performed at a North America EPA-recognized, third-party laboratory, per Directive No. 2011-06.

The product shall be verified with the same number of samples used to obtain the original qualification. Directive 2011-04 provides detailed guidance as to the number of samples that shall be retested for verification testing.

Post market surveillance requirements for NRCAN

Maintaining the use of the Curtis-Straus Energy Efficiency mark is predicated on continuing compliance with the requirements of the certification agreement which includes cooperation in the ongoing surveillance program defined in the test report and listing letter for each specific product. In accordance with the SCC accreditation, this maintenance post market surveillance as described below.

5% of all samples certified during the previous calendar year shall have surveillance testing performed annually.

Surveillance samples shall be typical of production. The samples shall be obtained from the following sources in preferred order: Retail outlet, Distributor warehouse, Manufacturing Line.

EU Type Examination

EU Type Examination certificates are valid for one year from issuance. Certificate holders may reapply and supply information regarding any modifications to the compliance file.

Reduction of Certification

Reduction of Certification will be determined after a review of any client communications that indicate that the Reduction of Certification may be warranted. An example of this may be when a client supplies information regarding modifications to a certified device. Curtis-Straus may, at that time, review the modification to determine if a Reduction of the Scope of Certification is necessary.

Extending of Certification

Extending Certification will be determined after a review of any client communications that indicate that the Extending of Certification may be warranted. An example of this may be when a client supplies information regarding modifications to a certified device. Curtis-Straus may, at that time, review the modification to determine if an Extension of the Scope of Certification is necessary.



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Procedure for Withdrawal, Suspension, Cancellation or Refusal of Certification

It is noted that Curtis-Straus cannot suspend, withdraw or cancel an FCC Grant of equipment authorization after 30 days of issue. It is also noted that removal from the Radio Equipment List (REL) on the Innovation, Science and Economic Development Canada (formerly Industry Canada) Website is the sole responsibility of ISED.

However, in accordance with the regulatory guidelines allowed and in accordance with its responsibility under ISO17065, Curtis-Straus shall maintain the right to suspend, withdraw or cancel any certification it has issued as follows:

Withdrawal of Certification

Withdrawal of certification shall apply to but shall not be limited to:

- Intentional misuse of certification
- Curtis-Straus being placed in a position of disrepute due to misuse, false advertisement, etc.
- Devices that are shown to be non-compliant or in continued violation of standards to which certification applies.
- General or specific violation of the license agreement.

Suspension of Certification

When certification is suspended, the supplier shall make no misleading claims as to the status of the certification. Upon the date of formal notice of suspension the supplier shall cease the use of the certificate. Under suspension, potentially defective certified products shall be subject to recall where appropriate.

Cancellation of Certification

Cancellation of Certification occurs when: A written request to cancel the certificate has been provided by the licensee.



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Refusal of Certification

Curtis-Straus reserves the right to refuse services for which it is not accredited to perform.

Procedures for handling Dismissals/Withdrawals>Returns for FCC and ISED Canada (formerly IC) or the EPA Energy Star program.

When a dismissal, withdrawal or a return of certification is received, Curtis-Straus will ensure that the client is notified immediately. A copy of the dismissal, withdrawal or return will be placed in the compliance folder and the directory of listed/certified products is updated. When a dismissal/withdrawal is requested by the client, this information is noted in the file, the directory of listed/certified products is updated.

Changes to product standards

In the event that a standard is withdrawn or revised during the term of the listing agreement, Curtis-Straus will determine the date by which the use of the Certification mark under the standard shall terminate and shall notify the applicant of such date.

Fees and Payment

This section details all the financial obligations that our clients have with the certification department and the expected actions related to payment.

Fee Schedule

Please contact our admin for our current fee schedule.

Invoicing

Once an application form is submitted to our CSUpload system, the application is officially active in our system. A review will be completed, at which point the project will be invoiced. Clients are expected to remit payment after an invoice is received. In the case where projects are submitted but a technical review has not occurred, projects will not be invoiced.

Payment Methods

Payment of fees may be made by credit card (Visa or MasterCard), check, bank draft, money order, or wire transfer. Payment by credit card shall specify the card type, name on the card, account number of the card, and the expiration date. If paying by check your remittance must be denominated in U. S. dollars drawn on a U. S. financial institution and made payable to Curtis-Straus LLC. No checks will be accepted for processing if older than six (6) months. All fees are non-refundable once Curtis-Straus accepts the application for processing.



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Complaints and appeals

Complaints

Clients are encouraged to provide feedback to Curtis-Straus regarding any positive experiences, as well as any disputes, appeals or complaints that affect the client's experience with Curtis-Straus.

In the event of a complaint or dispute, the Curtis-Straus Quality Manager will review the complaint with the appropriate parties in and decide on the appropriate action to resolve said complaint. A resolution of the complaint or plan for resolution will be completed within 30 days of acknowledged receipt of complaint.

The client will be informed of the progress and conclusion of the complaint resolution and will be offered an opportunity to contribute suggestions and offer additional recommendations, if warranted. Procedures for handling complaints, etc., are available to clients upon request.

Appeals

In the event of an appeal regarding dismissal or denial of an application for Certification, the submitter will have the option of providing written justification for a reversal of said decision; this written justification must be provided within 10 business days of the date of the decision. Curtis-Straus will review and provide a ruling on this within 10 business days of the date of the request.