

*Charter for the Project 25 Compliance
Assessment Program*

APRIL 2008

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1 Foreword

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 meet 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 recognized laboratories to conduct performance, conformance, and interoperability tests on their products. P25 equipment suppliers will release summary test reports from recognized labs along with declarations of compliance. 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 like P25 with protocols that 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.

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 promotes interoperability.

2 General Information

2.1 Purpose of this Document

This document serves as the charter for the P25 CAP program. It outlines the roles and responsibilities of the involved parties. This document also includes an overview of the program including what is required of testing laboratories, vendors, and other participants.

2.2 References

ISO/IEC 17000:2004, Conformity assessment—Vocabulary and general principles

ISO/IEC 17011:2004, Conformity assessment - General requirements for accreditation bodies accrediting conformity assessment bodies

ISO/IEC 17025:2005, General requirements for the competence of testing and calibration laboratories

ISO/IEC 17050:2004, Conformity assessment – Supplier’s declaration of conformity

Title 15 United States Code, Section 3710a, Cooperative Research and Development Agreements

NIST Handbook 153, Laboratory Recognition Process for Project 25 Compliance Assessment

2.3 Abbreviations

APIC—APCO 25 Interface Committee

CAPPTG—Compliance Assessment Process and Procedures Task Group

DHS OIC—Department of Homeland Security/Office for Interoperability and Compatibility

FOIA—Freedom of Information Act

NIST/OLES—National Institute of Standards and Technology/Office of Law Enforcement Standards

P25 CAP—Project 25 Compliance Assessment Program

P25 CAP/GB—Project 25 Compliance Assessment Program/Governing Board

P25 CAP/GBC—Project 25 Compliance Assessment Program/Governing Board Chairman

P25 CAP/GBVC—Project 25 Compliance Assessment Program/Governing Board Vice Chairman

P25 CAP/LPM—Project 25 Compliance Assessment Program/Laboratory Program Manager

SDoC—Supplier’s Declaration of Compliance

TSB—Telecommunications Systems Bulletin

2.4 Terms and Definitions

2.4.1 *APCO 25 Interface Committee (APIC):*

A P25 committee, comprised of P25 users and equipment manufacturer representatives, which develops initial drafts of P25 standards.

2.4.2 *Certificate of Recognition:*

A document presented by the P25 CAP to a laboratory that has demonstrated competence to conduct a particular Scope of Recognition of testing, that is, all of the test cases or a subset of test cases defined in the applicable Compliance Assessment Bulletin.

2.4.3 *Compliance Assessment Bulletin:*

A Compliance Assessment Bulletin is the primary product created by the P25 CAP/GB. The scope of a CAB can range from policy to guidance, covering issues such as specific test standards to be used for a particular P25 interface, guidelines for the creation of an SDoC, P25 LMR RFP Guidance, etc.

2.4.4 *Compliance Assessment Process and Procedures Task Group (CAPPTG):*

A subcommittee of the APCO 25 Interface Committee, or APIC. The mission of the CAPPTG is to ensure that P25 equipment and systems comply with P25 standards for interoperability, conformance, and performance, regardless of equipment supplier, and in accordance with the User Needs Statement of Requirements.

2.4.5 *Declared Equipment:*

A P25 product which: 1) has been tested at a P25 CAP-recognized laboratory; 2) has been determined by the equipment supplier to be compliant with all current requirements of the P25 CAP; 3) possesses a Supplier’s Declaration of Compliance (SDoC); and 4) has a summary test report that has been reviewed for accuracy and completeness by the P25 CAP Laboratory Program Manager.

2.4.6 *Model Class:*

Products defined by the equipment supplier as having identical P25 functionality will constitute a model class.

2.4.7 *Original Equipment Manufacturer (OEM):*

A company whose products are used as components or subsystems in another company’s product or products.

2.4.8 *Supplier's Declaration of Compliance (SDoC):*

An attestation by an individual or organization that a product is in conformance or compliance with specified requirements of documents such as standards, guides, or technical specifications.

2.4.9 *Scope of Recognition:*

This is the type of testing for which a laboratory has demonstrated compliance and competence. The particular test standards are contained in the relevant definition of Compliance Assessment Bulletins. The Scope of Recognition will list the actual test standards for which the laboratory has demonstrated competency..

2.4.10 *Telecommunications Systems Bulletin (TSB):*

Telecommunications Systems Bulletins are published by the TIA. A TSB is not a standard, but contains technical material that may be valuable to industry and users.

3 P25 Compliance Assessment Program Governing Board (P25 CAP/GB)

3.1 Purpose

The P25 CAP/GB represents the collective interests of organizations that procure P25 equipment. It establishes the policies of the P25 CAP, and assists the DHS OIC CAP Program Manager in the administration of the program.

3.2 Authority

The P25 CAP was established on the basis of directives from the United States Congress:

- a) Senate Report 109-088—Departments of Commerce and Justice, Science, and Related Agencies Appropriations Bill, 2006
- b) House Report 109-241—Making Appropriations for the Department of Homeland Security for the Fiscal Year Ending September 30, 2006, and for Other Purposes

The Director of the Department of Homeland Security (DHS) Office for Interoperability and Compatibility (OIC) has determined that the establishment of the GB is in accord with these directives. The membership of the Board is limited to active local, tribal, state, or Federal government employees.

3.3 Objectives and Scope of Activities

The P25 CAP/GB issues Compliance Assessment Bulletins (CAB)s in support of the operation of the P25 CAP. These CABs will constitute the collective body of information used by DHS OIC to develop requirements that must be met by equipment suppliers that participate in the P25 CAP.

3.4 Voting Members—Selection and Appointment

All members of the P25 CAP/GB are appointed—not elected—to their positions. With the exception of the P25 CAP/LPM, they are appointed by the Director of DHS OIC for terms appropriate for the accomplishment of the Board’s mission. They serve at the pleasure of the Director of DHS OIC. The P25 CAP/LPM is appointed by, and serves at the pleasure of, the Director of NIST Office of Law Enforcement Standards (NIST/OLES), as detailed in NIST Handbook 153.

Membership is limited to active local, tribal, state, or Federal government officials. Members are selected based on their experience with the management and procurement of land mobile radio systems and/or knowledge of conformity assessment programs and methods. Selections are made to balance those viewpoints required to effectively address P25 CAP issues under consideration.

Membership includes the responsibility to personally attend a certain number of P25 CAP/GB meetings. DHS OIC reserves the right to replace any member who is unable to fully participate in the Board’s meetings. Alternate members will not be permitted to represent those individuals appointed by DHS OIC without prior written agreement.

3.5 Ex Officio Members—Selection and Appointment

Members of certain emergency response-related organizations may be requested to participate in P25 CAP/GB proceedings, and will be given ex officio status on the Board. Ex officio members of the Board are appointed—not elected—to their positions by the Director of DHS OIC. They are appointed for terms appropriate to accomplish the Board’s mission. They serve at the pleasure of the Director of DHS OIC.

3.6 Meeting Procedures

The P25 CAP/GB will meet as required. All Board members must personally attend the annual meeting conducted at the end of the fiscal year. Board members may attend other meetings via teleconference. The Chairman will call meetings in consultation with the Vice Chairman, according to the considerations outlined in the sections below.

3.6.1 Rules

The P25 CAP/GB will operate in accordance with Robert’s Rules of Order Newly Revised (10th Edition).

3.6.2 Agenda

The Chairman will approve the agenda for all meetings. The Vice Chairman will distribute the agenda to the members prior to each meeting. The Vice Chairman also will publish an outline of the agenda with the notice of the meeting on the SAFECOM Web site. Any Board member may submit agenda items to the Vice Chairman or the Chairman. Items may also be suggested by non-members, including members of the public.

3.6.3 Minutes and Records

The Board's Vice Chairman will prepare minutes of each meeting, and will distribute copies to each Board member. Minutes of open meetings will be available to the public upon request. Minutes of closed meetings will also be available to the public upon request, subject to the withholding of matters about which public disclosure would be harmful to the interests of the Government, industry, or others, and which are exempt from disclosure under the Freedom of Information Act (FOIA). The minutes will include a record of the persons present either in person or via teleconference. They will include the names of Board members, names of staff, and the names of members of the public from whom written or oral presentations were made. They also will include a complete and accurate description of the matters discussed and conclusions reached, and copies of all reports received, issued, or approved by the Board.

All documents, reports, or other materials prepared by, or for, the Board constitute official government records. Therefore, they must be maintained according to DHS policies and procedures.

3.6.4 Open Meetings

Unless otherwise determined in advance, all meetings of the P25 CAP/GB will be open to the public. Once an open meeting has begun, it will not be closed for any reason. All materials brought before, or presented to, the Board during the conduct of an open meeting, including the minutes of the preceding open meeting, will be available to the public for review, or copying, at the time of the scheduled meeting.

Members of the public may attend any meeting or portion of a meeting that is not closed to the public. Members of the public may offer, at the determination of the Chairman, oral comment at such meeting. The Chairman may decide in advance to exclude oral public comment during a meeting. In this case, the meeting announcement published on the SAFECOM Web site will note that oral comment from the public is excluded, and will invite written comment as an alternative. Members of the public may submit written statements to the P25 CAP/GB at any time.

3.6.5 Closed Meetings

Meetings of the P25 CAP/GB will be closed only in certain, limited circumstances. Where the Chairman and Vice Chairman have determined in advance that discussions during a Board meeting will involve matters about which public disclosure would be harmful to the interests of the government, industry, or others, an advance notice of a closed meeting will be published on the SAFECOM Web site. The notice may announce the closing of all, or just part of, a meeting. If, during the course of an open meeting, matters inappropriate for public disclosure arise during discussions, the Chairman will order such discussion to cease, and will schedule it for closed session. Notices of closed meetings will be published on the SAFECOM Web site at least 15 calendar days in advance.

3.7 Quorum

Two thirds of the voting members of the P25 CAP/GB must be present to establish a quorum. In addition, in light of the P25 CAP/LPM's unique body of knowledge, a quorum may not be established in the absence of the LPM.

3.8 Voting

When a decision or recommendation of the P25 CAP/GB is required, the Chairman will request a motion for a vote. Any member, including the Chairman, may make a motion for a vote. A second on any proper motion is required to bring any issue to vote.

3.9 Role of Board Officials

3.9.1 Chairman

The Chairman works with the Vice Chairman to establish priorities and identify issues which must be addressed, determines the level and types of staff and financial support required, and serves as the focal point for the Board's membership. In addition, the Chairman is responsible for verifying the accuracy of minutes developed by the Vice Chairman to document the Board's meetings. The Chairman shall only vote in the event of a tie vote, in which case he will cast the deciding vote. The Chairman shall: 1) approve or call the meetings of the Board; and 2) approve agendas.

3.9.2 Vice Chairman

The Vice Chairman serves as DHS OIC's agent for all matters related to the Board's activities. The Vice Chairman shall: 1) in the absence of the Chairman, approve or call the meeting of the Board; 2) in the absence of the Chairman, approve agendas; and 3) attend all meetings.

In addition, the Vice Chairman is responsible for providing adequate staff support to the Board, including the performance of these functions:

1. Notifying members of the time and place for each meeting
2. Maintaining records of all meetings, including subgroup or working group activities, as required by law
3. Maintaining the roll
4. Preparing the minutes of all meetings of the Board's deliberations, including subgroup and working group activities
5. Attending to official correspondence
6. Maintaining official P25 CAP/GB records, and filing all papers and submissions prepared for or by the P25 CAP/GB, including those items generated by subgroups and working groups
7. Acting as the Board's agent to collect, validate, and pay all vouchers for pre-approved expenditures
8. Preparing and handling all reports, including the annual report, as required by DHS OIC

3.9.3 P25 CAP/LPM

The P25 CAP/LPM provides information to Board members on the operation of the laboratory assessment component of the program. The P25 CAP/LPM is a voting member of the GB.

3.10 Expenses and Reimbursement

Expenses related to the operation of the P25 CAP/GB will be borne by DHS OIC. Expenditures of any kind must be approved in advance by the Vice Chairman. Each organization within DHS OIC which sponsors a specific Board activity will be responsible for providing the support services, and will assure compliance with DHS-related policies and procedures.

Federal Government employees serving on the P25 CAP/GB are not eligible for any form of additional compensation. The Government may pay travel and per diem for non-Federal Government members at a rate equivalent to that allowable for Federal employees.

3.11 Questions and Complaints

Questions and complaints on the P25 CAP should be addressed to either:

- The P25 CAP/LPM for issues related to the laboratory recognition component of the program
- The P25 CAP/GBC for concerns related to the overall program.

4 Program Overview

The P25 CAP will formally recognize test laboratories for competence to conduct a predetermined set of tests on P25 products. The tests that those laboratories execute will demonstrate product compliance with a select group of requirements within the suite of P25 standards. Subsequently, DHS will require that equipment suppliers post summary reports of the test results and an SDoC on the SAFECOM Web site. To help their purchasing decisions, P25 users may search this Web site for products that have demonstrated compliance.

4.1 Creation of Standards

The TIA TR-8 Mobile and Personal Private Radio Standards committee creates the message, procedure, and protocol documents which define the operation and functionality of P25 equipment, subsystems, and services. TR-8 also produces normative compliance assessment-related performance, conformance, and interoperability standards that are used to evaluate product compliance. The P25 Steering Committee approves all published standards for P25 equipment.

Note: While the P25 Steering Committee normally adopts standards created by TIA TR-8, this is not a requirement.

4.2 Demonstration of Compliance

The test methods used in the program are chosen from P25-approved standards that are customarily drawn from the TIA-102 suite of standards. The intention is for the suite to contain performance, conformance, and interoperability test standards for each interface or major service. A variety of test methods are contained within each test standard. Many but not all of these test methods will be included in the minimal set of tests required for compliance demonstration in this program. A joint group of users and equipment suppliers, in the P25 Compliance Assessment Process and Procedures Task Group (CAPPTG), evaluates each test method within a test standard for suitability and inclusion within the program. CAPPTG then compiles a list of the required test methods drawn from each test standard, and releases them in the form of a draft compliance related Telecommunications Systems Bulletins (TSB). The compliance related TSB is approved by the P25 Steering Committee, and routed to the TR-8 for final editing and publication. The P25 CAP/GB uses these TSBs as the basis for the creation of CAB's with regard to required testing, but is not limited to the material in the compliance related TSB's.

4.3 Definition of Compliance

The 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. 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.

4.4 Program Participation

There are no membership requirements for equipment suppliers wishing to participate in the P25 CAP. The key requirements within the program are that test laboratories must be formally recognized to conduct testing, and that attestations of compliance must follow certain content and formatting requirements. Equipment suppliers are responsible for identifying which products are affected by the requirements, and should regularly check the SAFECOM Web site for changes.

Purchasers of equipment need not be associated with the program. The outputs from the program will be collected on a publicly available Web site that will simplify the process of identifying and evaluating equipment declared compliant.

4.5 Background on the CAB Process

When a P25 CAP test standard and/or compliance related TSB is published, the P25 CAP/GB reviews the documents and publishes the effective date of any new testing requirements contained within the test standard and/or compliance related TSB through a P25 CAP CAB issued by the P25 CAP/GB. Upon DHS publication of a revised test suite, based on CAP GB recommendations, the P25 CAP/LPM will prepare lead assessors (quality system experts) and subject matter expert assessors to conduct on-site assessments of laboratories for competence to conduct the new tests.

4.6 Changes to a CAB

As needed, each CAB will be updated periodically as new normative test documents are published for existing equipment or interfaces, or to incorporate tests for new types of equipment. Equipment suppliers are responsible for monitoring CABs so they can ensure that any previously released SDoCs are kept current based on changes in testing requirements. In some instances, this will require that previously tested equipment undergoes additional, supplementary testing, and that a supplementary summary test report be submitted along with an updated SDoC.

The P25 CAP/GB issue updates to its CAB's in the form of Final CAB's. Notices of Proposed CAB's will be published on the SAFECOM Web site; interested parties will be given 15 days to comment. After deliberating on any comments received, the P25 CAP/GB will either issue an updated Notice of a Proposed CAB or will release a Final CAB.

Final CABs will contain clear instructions on their effective date. The effective dates will provide grace periods to: 1) accommodate the time required to gain expanded scopes of recognition for a test lab; 2) allow time for TIA to publish and the P25 Steering Committee to approve P25 CAP related TSBs; and 3) publish or modify normative test standards.

Final CABs will include implementation dates for all new testing requirements. Typically, new CABs will be posted no less than four months in advance of the implementation date for a change in the requirements.

Note: It is the equipment supplier's responsibility to periodically check the SAFECOM Web site for Final CABs.

4.7 Required Test Laboratories

In accordance with NIST Handbook 153, *Laboratory Recognition Process for Project 25 Compliance Assessment*, all testing within the program will be conducted at laboratories that are formally recognized by the P25 CAP for competence, using processes and procedures of internationally accepted conformity assessment practices and systems. Recognition is granted to competent laboratories following a rigorous on-site assessment in which trained Laboratory Assessment Teams evaluate the laboratory for technical competence and quality system management. This is done to ensure accuracy, reproducibility, and repeatability of results.

Laboratory recognition is acknowledged by the issuance of a Certificate and Scope of Recognition that details the specific test methods, measurements, and services for which a laboratory has been recognized. The Scope of Recognition is associated with the scope of P25 CAP CABs. Laboratory practices are subject to audits during monitoring visits or periodic on-site assessments.

Equipment suppliers may conduct the tests themselves at their own formally recognized laboratory, i.e., *first-party* testing. Alternatively, the testing may be conducted at a recognized *second-party* laboratory, such as a government test lab, or by a recognized *third-party* test laboratory, such as an independent test lab. Equipment suppliers are responsible for selecting and, if applicable, funding these laboratories to perform the tests. All laboratories participating in the P25 CAP must be formally recognized for competence prior to conducting tests. NIST Handbook 153 explains the process by which a laboratory gains initial recognition or expands its scope to perform additional testing.

4.8 Required Tests

P25 equipment suppliers shall determine which tests are required by referencing the P25 CAP/GB Final CABs. Typically, one or more P25 CAP approved CABs will define the tests that must be performed on each type of equipment. Equipment suppliers should factor in the amount of time it might take a laboratory to gain initial recognition or expand its scope of recognition when planning to test their equipment. A laboratory shall not conduct tests that are used to support the SDoC until it has gained formal recognition.

P25 equipment purchasers may consult two sources for advance notice of product availability and testing requirements, respectively. The P25 Decision Tree document (<http://www.its.bldrdoc.gov/resources/p25/P25DocSelection.pdf>) provides advance notice of the completion of key standards which signal the availability of new products within the next 1 to 2 years. This document is most useful for forecasting product availability. Once the product is available and compliance-related tests are published, the P25 CAP/GB will issue advance notices of its intent to implement new testing requirements. Such notices will be presented in the form of a schedule that summarizes the testing requirements related to the entire P25 suite of standards and products.

Testing within the P25 CAP is limited to particular equipment types. This is because normative test procedures documents have not been created for all equipment types and offered services. Accordingly, unless the equipment type is specifically referenced in one of the P25 CAP/GB's Final CABs, the equipment supplier is not required to formally test that equipment as a part of the P25 CAP.

4.9 Governance of the Laboratory Recognition Process

The laboratory component of the P25 CAP is restricted to facilities that are recognized for competence by P25 CAP based on a recommendation from NIST through a process of on-site assessments by trained Laboratory Assessment Teams. The process is overseen by the P25 CAP/LPM, who governs the program under the guidelines set forth in the NIST Handbook 153. As noted in the Handbook, the Laboratory recognition process is managed using processes and procedures of internationally accepted conformity assessment systems.

4.10 Documentation Required for Attestations of Compliance

4.10.1 Supplier's Declaration of Compliance

For equipment which meets all of the P25 CAP requirements, the equipment supplier shall prepare an SDoC. The SDoC, and an accompanying summary test report which substantiates the declaration, constitutes a company's formal, public attestation of compliance with the standards for the equipment. They must be signed by responsible company officials. The SDoC and the associated summary test report constitute the complete set of documents required by the P25 CAP to declare compliance.

4.10.1.1 Required Format

All SDoCs shall be formatted using the template approved by the P25 CAP GB. That template is based on the requirements in ISO/IEC 17050:2004.

4.10.1.2 Review of SDoCs

Laboratories are required to submit the summary test reports and SDoCs to the OIC CAP Program Manager for review. The OIC CAP Program Manager SDoC review is a simple administrative process to ensure that the documentation is complete and accurate in accordance with the current P25 CAP processes. After reviewing the submission for completeness and accuracy, the OIC CAP Program Manager will either work with the equipment supplier to resolve discrepancies or upload the SDoC and summary test report to the SAFECOM Web site.

Note: In no way does this review constitute an endorsement or certification of product conformity or compliance from NIST or DHS. The equipment suppliers and Authorized Representative signatory to the SDoC bear full responsibility for the content, completeness, and accuracy of the SDoC. Neither NIST nor DHS shall bear any responsibility for incomplete or inaccurate statements within an SDoC.

4.10.1.3 Updates to SDoCs Following CAB Changes

If P25 CAP revision to a CAB necessitates additional tests for an existing piece of equipment, the equipment supplier must execute the supplemental tests, issue a revised SDoC, and post a supplementary summary test report. The revised SDoC must be forwarded to the OIC CAP Program Manager for review before it will be uploaded to the SAFECOM Web site. Similarly, if a CAB is updated or created and testing is required for a new piece of equipment, a new SDoC for that item, along with the accompanying summary test report, must be posted. Again, the SDoC must be reviewed by the OIC CAP Program Manager, who will then upload the SDoC and summary test report to the SAFECOM Web site.

4.10.1.4 Model Classes

It is customary for equipment suppliers to issue SDoCs for representative equipment which is the test article for a model class. This means equipment that the supplier has determined, through engineering analysis or internal functional testing, to be functionally equivalent to a particular, actual test article. For instance, a product with multiple software level revisions, such as 6.4.1, 6.4.2, and 6.4.3, may be determined to be functionally equivalent for all of these variations. The equipment supplier may publish an SDoC and summary test report for each revision based on testing the representative equipment. In this instance, the product variations are representative equipment which constitutes a “model class.” Based on the example, the model class would then be identified in the SDoC as all product variants containing software levels 6.4.x. Representative equipment in a model class shall produce test results equivalent to the actual test article.

To substantiate the validity of representative equipment in a model class, equipment suppliers shall keep documented evidence of engineering changes to their products, including:

- a) Detailed descriptions of changes to the item’s hardware, software, or firmware
- b) Version number for each modification
- c) Implementation date of each change
- d) Analysis of the impact of the change or the results of development engineering-level testing for each of the test requirements stipulated in the applicable P25 CAP CAB’s. This should include an explanation of why the subject modification should not affect the outcome of each test.

The analysis shall receive an overall grade according to the following schedule:

Grade I—Obvious that retesting is not required; product changes are cosmetic in nature or only affect functionality which is not standardized P25 functionality.

Grade II—Uncertain whether retesting is required; warrants a more thorough engineering analysis. For instance, changes in equipment supplier proprietary functionality, bug fixes, feature additions, etc.

Grade III—Obvious that retesting is required; substantial changes to the product’s hardware or firmware have occurred.

In accordance with NIST Handbook 153 Section 3.4, a published SDoC shall only apply to the model class tested. Other configurations or product variants that do not constitute representative equipment shall not be included in the SDoC. Product variants include changes in a product’s hardware, firmware, or software that relate to P25 functionality.

Note: Changes in interchangeable accessory items such as, but not limited to, batteries, programming and data cables, speakers, microphones, or antennas—which are required to make the equipment function, but are not an integral part of the functionality described within the SDoC— shall not constitute a product variant, unless those items are an integral part of product testing. For instance, radio performance testing may be conducted using a battery eliminator, so batteries would not represent a product variant. However, a test procedure that stipulated the use of an actual battery—perhaps to evaluate its performance under various environmental conditions—would make any battery other than the one tested a product variant.

Equipment suppliers are solely responsible for identifying product variants, and for determining whether a modified product requires re-testing. Nonconforming products may trigger a monitoring visit to the test laboratory and may result in revocation in laboratory recognition (this process is detailed in NIST Handbook 153 Section 4.12). and/or revocation of specific manufacturer’s SDoCs If laboratory recognition is revoked, all SDoCs traceable to that laboratory recognition may be scrutinized and may be removed by the OIC CAP Program Manager from the SAFECOM website.

4.10.2 Test Reports

The laboratory will produce two types of test reports—detailed and summary.

4.10.2.1 Detailed Test Reports

Detailed test reports provide complete documentation of test conditions to assist test repeatability and reproducibility. There are no formatting requirements for detailed test reports; however, NIST Handbook 153 Section 5.8 stipulates content requirements for detailed test reports, and test laboratories are required to maintain records of all testing.

4.10.2.2 Summary Test Reports

Summary test reports are intended to provide the equipment purchaser with a summary of the tests conducted on the equipment along with the test case verdicts. Since these documents are available to emergency response personnel for review, there are formatting requirements for these reports to ensure consistent presentation and interpretation of test results.

All summary test reports shall be in the format approved by DHS OIC, based on the recommendations of the P25 CAP/GB. Equipment suppliers are responsible for ensuring that their test lab uses the approved standard format for all summary test reports.

4.10.3 Posting Attestations of Compliance

The OIC CAP Program Manager is responsible for posting the SDoC and summary test reports for products on the SAFECOM Web site after these documents have been validated. (See <https://www.safecomprogram.gov/> - Note: the www.safecomprogram.gov website is in the process of adding P25 CAP material but has not posted live material as of the writing of this document).

4.10.4 Responsible Party

The seller of finished products is responsible for providing SDoCs for all products it sells. If a product contains components produced by an Original Equipment Manufacturer (OEM), the seller may provide an SDoC and summary test report prepared by the OEM.

4.10.5 Maintenance of SDoCs

4.10.5.1 SDoC Reviews

The P25 CAP/GB support personnel will periodically forward a list of current SDoCs to each equipment supplier—especially in advance of changes in P25 CAP CAB’s—to give the supplier an opportunity to review the impact of CAB changes on each SDoC’s continued validity. Equipment suppliers are responsible for seeking OIC CAP Program Manager review on SDoCs that are affected by changes.

4.10.5.2 SDoC Audits

The OIC CAP Program Manager will periodically conduct audits of the SDoCs on the SAFECOM Web site to ensure that all Declared Equipment remains valid in accordance with new P25 CAP/GB Final CABs. Equipment suppliers will be given 45 days notice to correct suspected discrepancies. SDoCs that have not been reviewed after the 45-day grace period will be removed from the SAFECOM Web site.

4.10.5.3 Resolution of Discrepancies

Discrepancies identified on the SAFECOM Web site shall be addressed with OIC’s P25 industry liaison. If the industry liaison determines that the errors are of a technical nature related to laboratory testing, they will be referred to the P25 CAP/LPM. The LPM will reply to the equipment supplier and the OIC P25 industry liaison within 30 days. Otherwise, the OIC P25 industry liaison shall reply to the complainant within 30 days. Equipment supplier disputes with the OIC P25 industry liaison which are not resolved within 60 days may be forwarded to the P25 CAP/GB for dispute resolution.

4.11 Control of Nonconforming Testing

If the P25 CAP/LPM verifies that a laboratory participating in the P25 CAP has generated nonconforming work that results in invalid test data, the P25 CAP/LPM may undertake review procedures outlined in NIST Handbook 153. If laboratory recognition is revoked, all SDoCs traceable to that laboratory recognition may be scrutinized and may be removed by the OIC CAP Program Manager from the SAFECOM website.

4.12 Control of Nonconforming Products

In the event an agency using P25 equipment identifies a product that it suspects does not conform to the standards, it should document the suspected nonconformity and contact the equipment seller for resolution of the problem. This allows the seller to investigate the problem and resolve possible implementation or configuration errors.

If this resolution process does not satisfy the end user agency and the functionality in question relates to a feature or function specifically tested as a part of the P25 CAP, the end user should contact the OIC CAP Program Manager. If the OIC CAP Program Manager determines that the matter warrants further investigation, he will convene a panel of Federal experts to review the matter. Efforts to reproduce the problem in a lab may be undertaken and the OIC CAP Program Manager may request copies of the supplier's change control documentation. The OIC CAP Program Manager will contact the equipment supplier to discuss the matter. If a concern regarding a lab's competency is raised, a laboratory monitoring visit may be undertaken in accordance with NIST Handbook 153 Section 4.9.

Should the panel appointed by the OIC CAP Program Manager determine that the nonconformity was due to a failure to retest a product variation, the P25 CAP/GB may vote to remove the product from the Declared Equipment list on the SAFECOM Web site. A two-thirds vote of the P25 CAP/GB members present shall be required to remove a product from the Web site. The equipment supplier would then be required to fully retest the product and post a new SDoC and summary test report for the product variant.

Note: If the feature or function in question was not evaluated as a part of the P25 CAP, the user should contact the P25 Technology Interest Group (PTIG) for assistance.

4.13 Relationship to Grant Programs

The CAB's created by the Board are intended to be of use to any organization or individual involved in the procurement of P25 equipment that desires a degree of demonstrated compliance with the standards. This can be a Federal agency, a grant funding organization, local, tribal, or state agencies, or private users of P25 equipment.

Recognizing grant funding organizations' unique applications of the CAB's created by the P25 CAP/GB, the Board shall work in consultation with these organizations to ensure that its CAB's are consistent with the laws governing the distribution of grants. As a result, grant funding organizations may reference the CAB's crafted by the P25 CAP/GB directly within applicable grant guidance.