



The following text has been created to deal with the issue of faked test reports. Specifically, the guidance is intended to help TCBCs and certification agents to identify a falsely created test report.

During our investigations, we found three main types of false test report:

### **1. Fake report created by an Agent**

In this scenario, an agent would take a test report template, perhaps from a test lab, and create his own report, often without the knowledge of the test lab. Often, the manufacturer thinks they are receiving a valid test report from the agent.

### **2. Fake report created by manufacturer with Lab support**

In this scenario, a manufacturer or agent would use a test lab's facilities to photograph their device in the test lab and the lab may allow the creation of a test report, without actually performing the tests. The lab will often know about this and support the activities.

### **3. Fake report created by test lab**

In this scenario, the test lab would accept the device for testing but not actually complete the full suite of tests. The lab may issue a test report, despite not completing a full set of tests. Results in the report may be 'made up' or copied from earlier test reports. The manufacturer may, or may not, be aware that the results are not genuine.

### **TCB Guidance on a code of conduct**

In this document, we list ways that each of these report types could be identified and we make suggestions of how to avoid accepting such a report.

Please note that some of the guidance and checking recommendations apply to more than one category of faked test report and are therefore duplicated in the lists provided below.

**Suggested solutions for false reports created and submitted by agents, without the test lab's knowledge or involvement:**

Develop a good relationship with the agent by discussing the project with him, not just accepting the money without any questions. Ask the agent about the project and how the device works. The agent should be able to describe the operation.
Tell the agent that you would like permission to speak directly with the test lab and the test engineer. If there is nothing to hide, this should not be a problem.
Ask for a conference call with the agent, the test lab and the manufacturer. Suggest that it is to discuss the project and plan for a smoother certification process. A fraudulent agent could not organise such a call.
Develop a good relationship with the test lab and ensure good communication with them. Maintain trust with the lab and understand their capabilities.
Look for different fonts or character styles throughout the report. Look for evidence of document editing.
Ensure that the test report does not contain conflicting names of multiple test labs. For example, a report may be written by one lab but measurements made at another. It is acceptable to contract work from one lab to another but this must be clear in the application and the report. The report should not be a maze of test lab confusion.
Speak to the test lab. Ask them to confirm that the testing was done on that date. Copy the lab if there are technical questions.
Study the test reports for confidence that the type of results do match the type of device. Not just a case of "does it pass or fail" but also "does it look right, for this product". If the results are taken from another device, the clue may be in the test results.
Check that the test photographs are in focus and clearly show the device under review.
Check that the list of test equipment matches the type of plots. Many plots will display the name of the test equipment manufacturer.
Ensure that the test equipment listed in the report, does match the equipment that was used for the test. Check that the test photos and the test parameters, do match the test equipment list.
Check that the calibration date of equipment matches the test dates, of course. However, also check that the calibration dates do not appear to have been edited, changed or manipulated.
Look online at other FCC applications which were tested by the same test lab. Even though the agent is submitting the application, the lab will be listed on the FCC site and can be used in a search. Check that the photos, plots and results are not duplicated.
If you notice a mistake in a test report and return it to the agent, how quickly is it updated? A test lab should take time to investigate and even re-check their results. An accredited lab will most likely have a complicated test report supersede procedure to follow, including revision numbers. Check to see if the new results appear faster than an investigation or re-test is possible. Check directly with the test lab about the corrections they make to their report.
Ensure that changes and modifications to test reports are correctly inserted (ideally accompanied by a revision history and number). Look for modifications that appear to have been edited on, or appear to be an editing modification of a document.
Do a thorough review and ask questions about things which concern you. Feedback indicates that fraudulent agents tend to seek out TCBs who ask fewer questions.
If an agent with false or fake test reports has been identified, report them to the TCB Council and/or the FCC. This details of the agent could be shared with other TCBs.

**Suggested solutions for false reports submitted by manufacturers or agents, with the test lab's knowledge and involvement:**

<p>Develop a good relationship with the company submitting the application by discussing the project with them, not just accepting the money without any questions. Ask them about the project and how the device works. They should be able to describe the operation.</p>
<p>Ask for a conference call with the agent, the test lab and the manufacturer. Suggest that it is to discuss the project and plan for a smoother certification process.</p>
<p>Ask the test lab questions about how they tested the device and how it operated. Ask for the test engineer's name and contact details; ask if you can speak with the engineer directly.</p>
<p>Develop a good relationship with the test lab and ensure good communication with them. Maintain trust with the lab and understand their capabilities.</p>
<p>Ensure that the test report does not contain conflicting names of multiple test labs. For example, a report may be written by one lab but measurements made at another. It is acceptable to contract work from one lab to another but this must be clear in the application and the report. The report should not be a maze of test lab confusion.</p>
<p>Study the test reports for confidence that the type of results do match the type of device. Not just a case of "does it pass or fail" but also "does it look right, for this product". If the results are taken from another device, the clue may be in the test results.</p>
<p>Check that the test photographs are in focus and clearly show the device under review.</p>
<p>Look online at other FCC applications which were tested by the same test lab. Even though the agent is submitting the application, the lab will be listed on the FCC site and can be used in a search. Check that the photos, plots and results are not duplicated.</p>
<p>If you notice a mistake in a test report and return it, how quickly is it updated? A test lab should take time to investigate and even re-check their results. An accredited lab will most likely have a complicated test report supersede procedure to follow, including revision numbers. Check to see if the new results appear faster than an investigation or re-test is possible. Check directly with the test lab about the corrections they make to their report.</p>
<p>Ensure that changes and modifications to test reports are correctly inserted (ideally accompanied by a revision history and number). Look for modifications that appear to have been edited on, or appear to be an editing modification of a document.</p>
<p>Do a thorough review and ask questions about things which concern you. Feedback indicates that fraudulent applicants tend to seek out TCBs who ask fewer questions.</p>
<p>If a test lab, agent or manufacturer with false or fake test reports has been identified, report them to the TCB Council and/or the FCC. This details could be shared with other TCBs.</p>

**Suggested solutions for false reports submitted by test labs, without correct test results:**

Develop a good relationship with the Lab submitting the application by discussing the project with them, not just accepting the money without any questions. Ask them about the project and how the device works. They should be able to describe the operation.

Ask for a conference call with the test lab and the manufacturer. Suggest that it is to discuss the project and plan for a smoother certification process. Encourage the lab to speak about their tests.

Ask the test lab questions about how they tested the device and how it operated. Ask for the test engineer's name and contact details; ask if you can speak with the engineer directly.

Ensure that the test report does not contain conflicting names of multiple test labs. For example, a report may be written by one lab but measurements made at another. It is acceptable to contract work from one lab to another but this must be clear in the application and the report. The report should not be a maze of test lab confusion.

Study the test reports for confidence that the type of results do match the type of device. Not just a case of "does it pass or fail" but also "does it look right, for this product". If the results are taken from another device, the clue may be in the test results.

Check that the test photographs are in focus and clearly show the device under review.

Look online at other FCC applications which were tested by the same test lab. Even though the agent is submitting the application, the lab will be listed on the FCC site and can be used in a search. Check that the photos, plots and results are not duplicated.

If you notice a mistake in a test report and return it, how quickly is it updated? A test lab should take time to investigate and even re-check their results. An accredited lab will most likely have a complicated test report supersede procedure to follow, including revision numbers. Check to see if the new results appear faster than an investigation or re-test is possible. Check directly with the test lab about the corrections they make to their report.

Ensure that changes and modifications to test reports are correctly inserted (ideally accompanied by a revision history and number). Look for modifications that appear to have been edited on, or appear to be an editing modification of a document.

Do a thorough review and ask questions about things which concern you. Feedback indicates that fraudulent test labs tend to seek out TCBs who ask fewer questions.

If the test lab's prices are lower and lead times are shorter than their competition, it could raise concerns about how thoroughly they are testing.

If a test lab, agent or manufacturer with false or fake test reports has been identified, report them to the TCB Council and/or the FCC. This details could be shared with other TCBs.