Module Integrator Guide and FAQ

FCC and ISED Host Integration Certification and Test-Laboratory Requirements: Draft guidance for radio module integrators

1 Purpose

This guide provides radio module integrators with guidance concerning FCC and Innovation, Science and Economic Development Canada (ISED) certification when integrating a certified radio module into a host product.

In particular, it addresses the FCC's new geographic restrictions on equipment-authorization conformity-assessment activities adopted in FCC 26-73, ET Docket No. 24-136, and explains how these requirements interact with host integration, modular approvals, permissive changes, pre-compliance testing and Canadian certification [1], [2]. [DOC-426300A1 | PDF], [FCC-26-73A1 | PDF]

The FCC's new rules generally require covered FCC testing, certification and accreditation activities to occur in the United States or a Reciprocal Economy beginning December 1, 2028 [1], [2]. [DOC-426300A1 | PDF], [FCC-26-73A1 | PDF]

ISED certification remains governed separately by Canadian requirements, including RSP-100, Certification of Radio Apparatus and Broadcasting Equipment, and ISED's laboratory-recognition procedures [3], [4]. [ised-isde.canada.ca], [ised-isde.canada.ca]

2 Existing Module Certifications

The FCC's new geographic requirements do **not generally require a properly authorized radio module to be recertified solely because the laboratory that originally tested it later becomes ineligible under the geographic requirements** [2]. [FCC-26-73A1 | PDF]

Consequently, an existing FCC modular approval does not automatically become invalid on December 1, 2028 merely because the original testing occurred in a country that subsequently becomes a non-Reciprocal Economy [2]. [FCC-26-73A1 | PDF]

Integrator takeaway: The laboratory-location requirement primarily affects new conformity-assessment activities. It does not automatically invalidate an existing FCC module grant.

3 When the Host Can Rely on the Module Approval

An integrator may continue relying upon the module's existing approval where the integration remains within the conditions applicable to that approval.

The integrator should determine whether the host installation satisfies applicable conditions, including, as relevant:

- approved antenna types and gains;
- installation configuration;
- RF exposure conditions;
- separation distances;
- simultaneous-transmission conditions;
- host labeling and instructions;
- module integration instructions; and
- other grant-specific limitations.

The new FCC reciprocity policy does not itself replace these existing integration obligations.

For Canada, RSP-100 contains specific requirements relevant to the incorporation of certified modules into host products, including requirements associated with handheld and wearable host products [3]. [ised-isde.canada.ca]

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4 When Additional Host Testing Is Required

A host integration may require additional regulatory evaluation or certification activity when, for example:

- an antenna configuration falls outside the module authorization;
- a different RF exposure condition is introduced;
- simultaneous transmission requires additional evaluation;
- modifications exceed the conditions of the existing modular approval;
- the host itself requires certification;
- a permissive change or new FCC equipment authorization is required; or
- additional testing is otherwise necessary to demonstrate compliance.

For FCC applications subject to the new requirements, official conformity-assessment work relied upon for certification must satisfy the applicable FCC geographic restrictions [2]. [FCC-26-73A1 | PDF]

This creates an important distinction between an **existing module authorization** and **new certification work arising from the integration of that module**.

5 What Constitutes FCC Test-Lab "Covered Activity"?

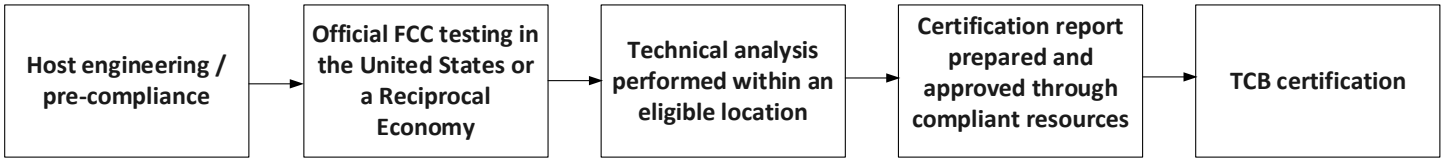
The FCC's geographical requirements extend beyond simply asking where the test chamber is located.

For a Test Lab, covered activities include substantive functions such as:

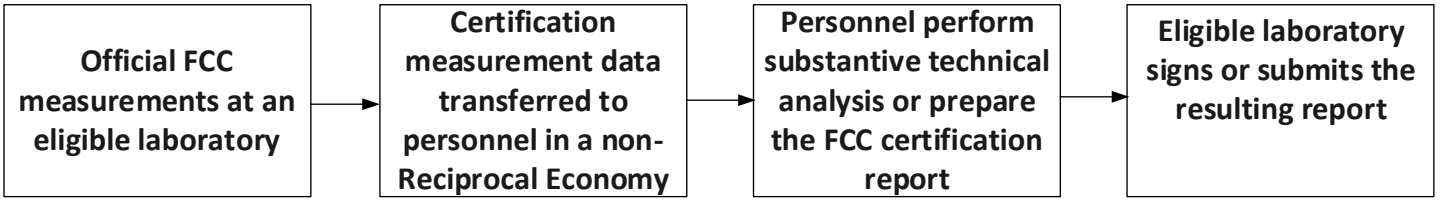
1. test setup and operation;
2. required measurements;
3. technical analysis of measurement results;
4. preparation of the certification test report; and
5. approval of the test report [2]. [FCC-26-73A1 | PDF]

Therefore, compliance should **not be evaluated solely by determining where RF or EMC measurements physically occur**.

5.1 Example of an appropriate certification workflow



5.2 Potentially problematic workflow



Such an arrangement should not be assumed compliant merely because the physical measurements occurred in an eligible laboratory. The FCC's covered activities include substantive technical analysis and report preparation/approval [2]. [FCC-26-73A1 | PDF]

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6 Pre-Compliance and Engineering Testing

The distinction between **development testing** and **certification testing** becomes increasingly important.

The FCC distinguishes pre-compliance and R&D activities that are not relied upon for certification from FCC-recognized covered activity [2]. [FCC-26-73A1 | PDF]

Therefore, integrators may maintain a global engineering process.

For example:

6.1 Development and pre-compliance

Potential activities can include:

- antenna tuning;
- conducted measurements;
- troubleshooting;
- EMC pre-scans;
- RF debugging;
- prototype evaluation; and
- design optimization.

These may then be followed by:

6.2 Certification activity

- final certification configuration;
- official certification measurements;
- required technical analysis;
- certification test-report preparation; and
- applicable certification activities.

The critical distinction is whether the work is **developmental/pre-compliance activity** or is being relied upon as evidence supporting the FCC authorization [2]. [FCC-26-73A1 | PDF]

7 FCC Versus ISED

The FCC geographic rule should **not be represented as an ISED requirement**.

The U.S. and Canadian regulatory frameworks remain separate.

Issue	FCC	ISED Canada
Regulatory authority	FCC	ISED
Module authorization	FCC ID	ISED certification number
FCC geographic reciprocity requirements	**Yes**	**Not automatically applicable**
FCC transition discussed here	**December 1, 2028**	N/A
Laboratory-recognition system	FCC framework	Independent ISED framework
Canadian RF exposure	N/A	RSS-102
Host/module requirements	FCC requirements and grant conditions	Canadian RSS/RSP requirements

ISED operates its own recognized-testing-laboratory program under REC-LAB, Procedure for the Recognition of Testing Laboratories to Test/Assess to Canadian Requirements [4]. [ised-isde.canada.ca]

ISED also defines laboratory scopes for Canadian RSS requirements and RF-exposure evaluation. These include RSS-102 measurement and simulation capabilities for SAR, nerve stimulation, absorbed power density and incident power density [5], [6]. [ised-isde.canada.ca], [ised-isde.canada.ca]

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8 Combined FCC/ISED Certification

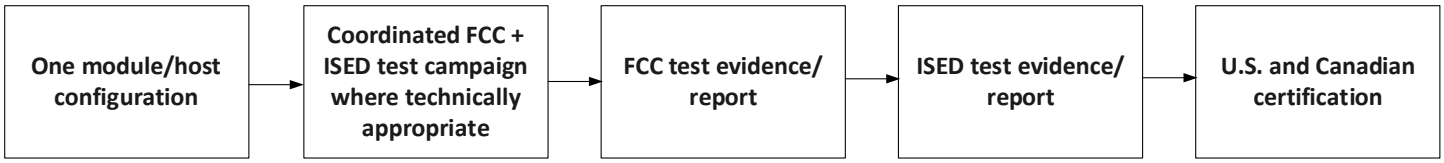
Radio-module integrators frequently seek to use a common test campaign to support both U.S. and Canadian approvals.

The FCC geographic requirements make laboratory selection increasingly important.

A preferred laboratory strategy is to select a laboratory that:

- satisfies applicable FCC recognition requirements;
- is located in the United States or an eligible FCC Reciprocal Economy;
- possesses appropriate ISED recognition when Canadian certification is required;
- possesses the appropriate technical scopes; and
- can perform required testing, analysis and reporting through compliant resources [2], [4], [5]. [FCC-26-73A1 | PDF], [ised-isde.canada.ca], [ised-isde.canada.ca]

A coordinated workflow may therefore be:



This approach reduces the risk of discovering late in development that a laboratory suitable for one jurisdiction cannot support the other.

9 Taiwan and Reciprocal-Economy Testing

Under FCC 26-73, Taiwan is treated as a Reciprocal Economy for purposes of the FCC geographic requirements [2]. [FCC-26-73A1 | PDF]. Ezurio uses partner laboratories in Taiwan.

Accordingly, an appropriately recognized laboratory located in Taiwan may remain a viable location for activities such as:

- FCC module testing;
- FCC host-related certification testing;
- permissive-change testing;
- FCC technical analysis/reporting; and
- combined FCC/ISED programs where the laboratory separately meets ISED requirements.

ISED eligibility remains a separate determination and should be verified against the laboratory's current ISED recognition and its scope for the particular technical standards required by the project [4], [5]. [ised-isde.canada.ca], [ised-isde.canada.ca]

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10 Recommended Host Integration Certification Workflow

10.1 Step 1: Identify the module authorization

Record:

- FCC ID;
- ISED certification number;
- module model/HVIN;
- applicable grant conditions;
- approved antenna configurations; and
- applicable RF-exposure conditions.

10.2 Step 2: Determine whether the host remains within the authorization

Ask:

Is the module being installed according to all applicable integration and authorization conditions?

YES: Determine the remaining host-level regulatory requirements.

NO: Determine whether additional testing, a permissive change or another authorization path is necessary.

For Canadian products, consult the applicable requirements of RSP-100 [3]. [ised-isde.canada.ca]

10.3 Step 3: Determine what additional evidence is required

Depending upon the radio, antenna and host configuration, areas for consideration can include:

- radiated/spurious emissions;
- antenna compliance;
- simultaneous transmission;
- SAR;
- MPE/RF exposure;
- power density;
- host EMC;
- DFS; and
- other host-specific certification requirements.

For Canadian RF-exposure evaluations, the applicable RSS-102 requirements should be considered [6]. [ised-isde.canada.ca]

10.4 Step 4: Classify the testing

Determine whether the measurements are:

Development/R&D/pre-compliance

or

Official certification measurements.

For FCC work, this distinction matters because pre-compliance and R&D activities not relied upon for certification are treated differently from covered certification activity under the new policy [2]. [FCC-26-73A1 | PDF]

10.5 Step 5: Qualify the laboratory

For FCC applications subject to the new geographic requirements, verify:

- FCC recognition;
- laboratory country;
- Reciprocal Economy status;
- accreditation and applicable scope;

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- physical measurement location;
- location performing technical analysis;
- location preparing the certification report; and
- location approving the certification report [2]. [FCC-26-73A1 | PDF]

For Canada, separately verify:

- ISED recognition;
- applicable RSS scope;
- applicable RSS-102 scope;
- measurement/simulation capability where applicable; and
- applicable Canadian certification requirements [4]-[6]. [ised-isde.canada.ca], [ised-isde.canada.ca], [ised-isde.canada.ca]

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11 Module Integrator FAQ

11.1 Q1. Does an existing FCC-certified module lose its FCC ID on December 1, 2028?

No, not merely because of the new geographic restrictions.

The FCC Order addresses the treatment of existing authorizations and does not create blanket retesting of previously authorized products simply because a laboratory later becomes geographically ineligible [2]. [FCC-26-73A1 | PDF]

11.2 Q2. Must an integrator retest every certified module after December 1, 2028?

No.

The new policy concerns conformity-assessment activity subject to the geographic restrictions. It does not establish a general requirement to recertify every existing modular approval [2]. [FCC-26-73A1 | PDF]

11.3 Q3. Can an FCC-certified module be integrated into a host manufactured in a non-Reciprocal Economy?

Manufacturing location and the location of FCC-recognized conformity-assessment activity are not necessarily the same regulatory question.

The Order focuses on covered testing, certification and accreditation activities [2]. [FCC-26-73A1 | PDF]

The integrator must separately ensure that the module is integrated in accordance with the applicable authorization and integration conditions.

11.4 Q4. Can host development and pre-compliance testing occur in a non-Reciprocal Economy?

Potentially, yes.

The FCC distinguishes pre-compliance and R&D testing not relied upon for certification from FCC-recognized covered activities [2]. [FCC-26-73A1 | PDF]

Integrators should ensure that development measurements are not improperly represented or relied upon as official FCC certification measurements.

11.5 Q5. Can official FCC certification testing occur in a non-Reciprocal Economy after the transition?

For activities subject to the new requirements, FCC-recognized covered activity must occur in the United States or an eligible Reciprocal Economy after the **December 1, 2028** transition [1], [2]. [DOC-426300A1 | PDF], [FCC-26-73A1 | PDF]

11.6 Q6. Can FCC certification testing be conducted in Taiwan?

Under FCC 26-73, Taiwan qualifies as a Reciprocal Economy for purposes of these geographic restrictions [2]. [FCC-26-73A1 | PDF]

The laboratory must still satisfy applicable FCC recognition, accreditation and technical-scope requirements.

11.7 Q7. Can measurements be performed in an eligible country but analyzed elsewhere?

This requires careful review.

The FCC includes substantive technical analysis, certification-report preparation and report approval within Test Lab covered activities [2]. [FCC-26-73A1 | PDF]

Therefore, geographic compliance should not be determined solely from the location of the physical test chamber.

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11.8 Q8. If an integrator improperly obtains a new host certification using prohibited testing, is the original module grant automatically revoked?

The Order does not establish automatic revocation of the underlying module grant merely because of improper subsequent host-certification activity.

The module authorization and subsequent host certification activities should be treated as separate regulatory issues. The FCC nevertheless retains authority to address deficiencies affecting an authorization itself, including inaccurate or fraudulent certification information [2]. [FCC-26-73A1 | PDF]

11.9 Q9. Do the new FCC geographic rules automatically apply to ISED certification?

No.

FCC 26-73 is an FCC rule. ISED maintains its own Canadian laboratory-recognition and certification framework through requirements such as RSP-100, REC-LAB and the applicable Radio Standards Specifications [3], [4]. [ised-isde.canada.ca], [ised-isde.canada.ca]

11.10 Q10. Can the same laboratory perform both FCC and ISED testing?

Yes, provided the laboratory independently satisfies the requirements of both regulatory systems for the work being performed.

For ISED work, laboratory recognition and applicable technical scope should be verified. ISED publishes recognized scopes covering Canadian RSS standards, including specialized RSS-102 measurement and simulation capabilities [4]-[6]. [ised-isde.canada.ca], [ised-isde.canada.ca], [ised-isde.canada.ca]

11.11 Q11. What happens to a permissive change after December 1, 2028?

The continued validity of an existing grant should be distinguished from **new conformity-assessment activity supporting a modification**.

Where a modification requires new FCC-recognized testing, the new testing must meet the applicable requirements in force when the new certification activity occurs [2]. [FCC-26-73A1 | PDF]

11.12 Q12. What documentation should an integrator obtain from the laboratory?

For FCC certification, consider documenting:

- laboratory identity;
- physical test location;
- FCC recognition;
- scope of accreditation;
- country of measurement;
- location of technical analysis;
- location of report preparation;
- location of technical review/approval; and
- applicable Reciprocal Economy status [2]. [FCC-26-73A1 | PDF]

For ISED certification, additionally verify:

- ISED laboratory recognition;
- applicable RSS scope;
- applicable RSS-102 scope; and
- required measurement or simulation capability [4]-[6]. [ised-isde.canada.ca], [ised-isde.canada.ca], [ised-isde.canada.ca]

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12 Recommended Customer Notice

FCC/ISED Certification Notice

Integrators requiring additional regulatory testing as a result of host integration are responsible for ensuring that testing and certification activities comply with the requirements applicable to the intended market.

Beginning December 1, 2028, FCC equipment-authorization conformity-assessment activities subject to the FCC's geographic restrictions must be performed in the United States or an eligible Reciprocal Economy [1], [2]. These requirements may extend beyond physical measurements to substantive technical analysis, certification test-report preparation and approval activities [2].

Pre-compliance and developmental testing should not be represented or relied upon as FCC certification testing unless the applicable FCC requirements are satisfied [2].

Canadian certification remains independently subject to requirements established by Innovation, Science and Economic Development Canada, including applicable laboratory-recognition, RSS and RF-exposure requirements [3]-[6].

13 References

[1] Federal Communications Commission, "FCC Proceeds on Device Test Lab Onshoring, Reciprocity Rules: New Rules Will Limit Testing to Labs in the U.S. or Country That Offers Reciprocal Recognition," Washington, DC, USA, Oct. 29, 2026, DOC-426300A1. [DOC-426300A1 | PDF]

[2] Federal Communications Commission, "Third Report and Order and Third Further Notice of Proposed Rulemaking," *Protecting Against National Security Threats to the Communications Supply Chain through the Equipment Authorization Program*, ET Docket No. 24-136, FCC 26-73, Washington, DC, USA, Oct. 29, 2026, FCC-26-73A1. [FCC-26-73A1 | PDF]

[3] Innovation, Science and Economic Development Canada, "RSP-100: Certification of Radio Apparatus and Broadcasting Equipment," Radio Standards Procedure RSP-100, Issue 12, Aug. 2019. [Online]. Available: ISED RSP-100. [ised-isde.canada.ca]

[4] Innovation, Science and Economic Development Canada, "REC-LAB: Procedure for the Recognition of Testing Laboratories to Test/Assess to Canadian Requirements," Issue 8, Jun. 25, 2024, Amendment 1, Feb. 14, 2025. [Online]. Available: ISED REC-LAB. [ised-isde.canada.ca]

[5] Innovation, Science and Economic Development Canada, "Testing Laboratory Scope of Recognition," Mutual Recognition Agreements/Arrangements, updated Jun. 10, 2026. [Online]. Available: ISED Testing Laboratory Scope. [ised-isde.canada.ca]

[6] Innovation, Science and Economic Development Canada, "RSS-102: Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)," Issue 6, Dec. 15, 2023. [Online]. Available: ISED RSS-102. [ised-isde.canada.ca]

[7] Microsoft, *Microsoft Copilot*, "Drafting assistance for *Module Integrator Guide and FAQ: FCC and ISED Host Integration Certification and Test-Laboratory Requirements*," generated from user-supplied FCC documents and cited ISED regulatory sources, Nov. 5, 2026.

13.1 Document-generation disclosure

This guide was prepared with drafting and synthesis assistance from Microsoft Copilot [7]. Regulatory conclusions and requirements are supported by the primary FCC and ISED sources identified in Refs. [1]-[6]. Reference [7] documents **how the guide was generated and is not a regulatory authority**.

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