

## INTERNATIONAL ACCREDITATION SERVICE, INC.

5360 Workman Mill Road · Whittier, CA 90601 USA  
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July 19, 2008

**TO: IAS-ACCREDITED INSPECTION AGENCIES, TESTING LABORATORIES AND OTHER INTERESTED PARTIES**

**SUBJECT: Proposed Revisions to the Accreditation Criteria for Field Evaluation of Unlisted Electrical Equipment, Subject AC354-0908-0908-R1 (HB/RN)**

**Hearing Information:**

Thursday, September 18, 2008

8:00 a.m.

**Minneapolis Convention Center**

1301 Second Avenue South

Minneapolis, Minnesota 55403

Dear Madam or Sir:

This item has been placed on the committee agenda for discussion at the above-noted hearing. The proposed revisions are to Section 5.1 regarding maintenance of documentation; Section 5.6 regarding subcontracting of evaluations; and Section 6.2.19 regarding report requirements.

You are cordially invited to submit written comments, or to attend the committee hearing and present verbal comments. Written comments will be forwarded to the committee, **prior to the hearing**, if received by **August 28, 2008**. If the deadline is missed, you must provide 25 copies of the submittal material, collated, stapled and three-hole punched, either to the Whittier office before the committee meeting, or at the meeting itself.

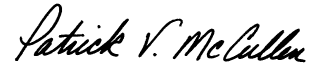
Any written material submitted for committee consideration will be available for public distribution as set forth in Section 2.7 of the Rules of Procedure for Accreditation Committee Meetings (copy enclosed).

Visual aids (including, but not limited to, charts, overhead transparencies, slides, videos, or presentation software) for viewing at meetings will be permitted only if the presenter provides to IAS, before the presentation, a copy of the visual aid(s) in a medium that can be retained by IAS with its record of the meeting, and that can also be provided to interested parties.

Your cooperation is requested in forwarding to the Whittier office all material directed to the committee. Parties interested in the deliberations of the committee should refrain from communicating, whether in writing or verbally, with committee members regarding agenda items. The committee reserves the right to refuse communications that do not comply with this request.

If you have any questions, please contact Hershaw Brewer, senior accreditation officer, at 562-699-0541, extension 3309, or the undersigned at extension 3309. You may also reach us by e-mail at [info@iasonline.org](mailto:info@iasonline.org).

Yours very truly,

A handwritten signature in black ink that reads "Patrick V. McCullen". The signature is written in a cursive style with a large initial 'P'.

Patrick V. McCullen  
Vice President

PVM/cjm

Enclosures

cc: Accreditation Committee

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*Leading Accreditors Since 1975*

## RULES OF PROCEDURE FOR ACCREDITATION COMMITTEE MEETINGS

### 1.0 PURPOSE

The purpose of the Accreditation Committee and its meetings is to monitor the work of and to develop accreditation criteria for International Accreditation Service, Inc. (IAS).

### 2.0 MEETINGS

**2.1** The Accreditation Committee shall schedule meetings that are open to the public in discharging its duties under Section 1, subject to Section 5.

**2.2** All scheduled meetings shall be publicly announced.

**2.3** Two-thirds ( $2/3$ ) of the voting Accreditation Committee members shall constitute a quorum. A majority vote of members present is required on any action.

**2.4** In the absence of the nonvoting Chair-Moderator, Accreditation Committee members present shall elect an alternate Chairman from the committee for that meeting. The alternate Chairman shall be counted as a voting committee member for purposes of maintaining a committee quorum and to cast a tie-breaking vote of the committee.

**2.5** Minutes of the meetings shall be kept.

### 3.0 MEETING RECORDS

An electronic audio record of meetings shall be made by IAS; no other audio, video, electronic or stenographic recordings of the meetings will be permitted. Visual aids (including, but not limited to, charts, overhead transparencies, slides, videos, or presentation software) viewed at meetings shall be permitted only if the presenter provides IAS before presentation with a copy of the visual aid in a medium which can be retained by IAS with its record of the meeting and which can also be provided to interested parties requesting a copy. A copy of the IAS recording of the meeting and such visual aids, if any, will be available to interested parties upon written request made to IAS together with a payment as required by IAS to cover costs of preparation and duplication of the copy. These materials will be available beginning five days after the conclusion of the meeting but will no longer be available after 30 days have elapsed from the conclusion of the meeting.

### 4.0 WRITTEN COMMUNICATIONS AND SUBMISSIONS

Parties interested in the deliberations of the committee should refrain from communicating, whether in writing or verbally, with committee members regarding agenda

items. All written communications and submissions regarding agenda items should be delivered to IAS. All such written communications and submissions shall be considered nonconfidential and available for discussion in open session of an Accreditation Committee meeting, and shall be delivered *at least ten days* before the scheduled Accreditation Committee meeting if they are to be forwarded to the Committee. Correspondence received by IAS will not be released to any party, except to the Accreditation Committee, prior to the meeting without permission of the author. The committee reserves the right to refuse recognition of communications which do not comply with the provisions of this section. All such communications and submissions will be available from IAS upon written request and payment of costs associated with duplication. The materials will be available beginning five days after the conclusion of the meeting but will no longer be available after 30 days have elapsed from the conclusion of the meeting.

### 5.0 CLOSED SESSIONS

Meetings shall be open except that the chairman may call for a closed session to seek advice of counsel.

### 6.0 ACCREDITATION CRITERIA

Accreditation criteria are established by the committee to provide a basis for International Accreditation Service, Inc., accreditations. Consideration of accreditation criteria must be in conjunction with a current and valid application for an IAS accreditation listing or as otherwise determined by the Accreditation Committee.

#### 6.1 Procedure

##### 6.1.1 New Criteria

**6.1.1.1** Proposed accreditation criteria may be submitted by interested parties to IAS, and shall be developed by the IAS staff and discussed in open session with the Accreditation Committee during a scheduled meeting.

**6.1.1.2** Proposed accreditation criteria shall be available to interested parties at least 45 days before discussion at the committee meeting.

**6.1.1.3** The committee shall be informed of all pertinent written communications received by IAS.

**6.1.1.4** Attendees at Accreditation Committee meetings shall have the opportunity to speak on accreditation criteria listed on the meeting agenda, to provide information to committee members.

## **6.1.2 Existing Criteria**

**6.1.2.1** Changes to existing accreditation criteria may be submitted by interested parties to IAS, and shall be developed by the IAS staff. Existing accreditation criteria may be revised by the committee either (i) at a public meeting pursuant to the procedures set forth herein, or (ii) by postal ballot, provided public notice is provided as stipulated in Section 6.1.1.2.

**6.1.2.2** The committee shall be informed of all pertinent written communications received by IAS. Parties interested in the proposed revisions to accreditation criteria may deliver communications and submissions regarding such proposed revisions to IAS within 35 days of the posting of the public notice regarding such proposed revisions to accreditation criteria. Such communications and submissions will otherwise be subject to the provisions of Section 4.0.

**6.1.2.3** Upon an amendment to existing accreditation criteria, the effective date of the criteria shall be no earlier than 30 days after publication of the approved criteria.

## **6.2 Approval**

Approval of accreditation criteria shall be as specified in Section 2.3 of these rules.

***Approved by the Board of Directors***

***October 4, 2007***

# **INTERNATIONAL ACCREDITATION SERVICE, INC.**

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## **PROPOSED REVISIONS TO THE ACCREDITATION CRITERIA FOR FIELD EVALUATION OF UNLISTED ELECTRICAL EQUIPMENT**

**AC354**

**Proposed September 2008**

**(Previously issued August 2006)**

### **PREFACE**

The attached accreditation criteria has been proposed to provide all interested parties with an opportunity to comment. If the proposed criteria is an updated version from a previous edition, underlined text within the criteria indicate a technical change or addition from the previous edition; and text marked with the strikethrough indicates where a paragraph or item has been deleted if the deletion resulted from a technical change. This criteria may be further revised as the need dictates.

IAS may consider alternate criteria provided the proponent submits substantiating data demonstrating that the alternate criteria are at least equivalent to the attached criteria and otherwise meet applicable accreditation requirements.

# PROPOSED REVISIONS TO THE ACCREDITATION CRITERIA FOR FIELD EVALUATION OF UNLISTED ELECTRICAL EQUIPMENT

## 1.0 INTRODUCTION

**1.1 Purpose:** The purpose of this accreditation criteria is to specify requirements for IAS-accredited field evaluation bodies (FEBs) performing evaluations of unlisted electrical equipment installed in the field. FEBs complying with this criteria will have demonstrated that they have the personnel, organization, experience, knowledge and competence to inspect and test unlisted electrical equipment installed in the field in accordance with specified requirements.

**1.2** This criteria is limited to inspection and related testing only and does not apply to the products or the design or performance characteristics of the products.

**1.3** This criteria specifically excludes listing of field-installed electrical equipment and specifically excludes surveillance of the product unless periodic surveillance is directed by the authority having jurisdiction (AHJ).

## 2.0 REFERENCES

**2.1** Recommended Practice and Procedure for Unlabeled Electrical Equipment Evaluation, developed by the American Council for Electrical Safety, a Division of the American Council of Independent Laboratories (ACIL). (Available on the web at <http://www.acil.org/associations/1304/files/RecomPractUnlabeledEquipupdated72005.pdf>.)

**2.2** Recommended Competency Guidelines for Third Party Field Evaluation Bodies, developed by the American Council for Electrical Safety, a Division of the American Council of Independent Laboratories (ACIL).

**2.3** ISO/IEC (International Organization for Standardization/International Electrotechnical Commission) Standard 17025:2005, General Requirements for the Competence of Calibration and Testing Laboratories.

**2.4** ISO/IEC (International Organization for Standardization/International Electrotechnical Commission) Standard 17020:1998, General Criteria for the Operation of Various Types of Bodies Performing Inspection.

## 3.0 DEFINITIONS

**3.1 Authority Having Jurisdiction (AHJ):** Governmental organization, office, and/or representative responsible for approving equipment, materials, installations, procedure(s), and/or structures; authoritative body which performs functions related to enforcement of construction and other laws; and/or the officer or other designated authority charged with the administration and enforcement of codes as adopted in their jurisdiction. Typically, a building department, code enforcement official, fire marshal, or similar.

**3.2 Emergency Main Off (EMO):** Also known as Emergency Stop or Emergency Machine Off. A category 0 stop device that overrides all other controls to remove power from all control actuators and bring the equipment to a safe stand-by condition.

**3.3 Engineer:** Personnel specifically designated as responsible for oversight and approval, and for assuring the quality and technical competence of inspections and associated testing.

**3.4 Evaluated Mark:** The mark or symbol applied by the evaluation agency to indicate conformance to the relevant product safety standard(s), and to other applicable requirement(s) as directed in this criteria.

**3.5 Field Evaluation:** The process used for one-of-a-kind, limited-production, used, or modified products that are not listed or labeled under a full listing and certification program. The process is completed at the point of manufacturing, interim points of distribution, in the evaluating company's facilities, at the final installation site, or a combination of the above.

**3.6 Field Evaluation Body (FEB):** An organization furnishing evaluation services under this criteria, accredited by IAS in accordance with this criteria.

**3.7 Inspector:** Personnel appropriately trained to inspect products or systems or types of products or systems in a field installation, and appropriately trained and qualified to conduct any associated testing that may be required.

**3.8 Listed:** Equipment, materials, or services included in a list published by an organization acceptable to the AHJ and concerned with evaluation of products or services. The organization maintains periodic inspection of production of listed equipment or materials or periodic evaluation of services, and the listing states either that the equipment, material, or service meets identified standards or that it has been tested and found suitable for a specified purpose.

**3.9 Product:** An unlisted item, product, or system installed in a field location. The product may or may not have listed components or subsystems.

## 4.0 GENERAL REQUIREMENTS

**4.1 Required:** The organization seeking accreditation under this criteria must meet all requirements of the Recommended Competency Guidelines for Third Party Field Evaluation Bodies, and the Recommended Practice and Procedure for Unlabeled Electrical Equipment Evaluation.

### 4.2 Assessment by IAS

**4.2.1** Prior to accreditation under this criteria, the FEB is required to undergo a field assessment by IAS. The purpose of this assessment is to assess the evaluation procedures and the competence of personnel performing the evaluation.

**4.2.2** IAS field observation of the FEB's personnel under this criteria is required every two years. Depending on the number of personnel employed by the FEB (staff and/or contract), a sampling of personnel may be observed. Scheduling for field observations may be flexible, depending on evaluation contracts.

### 4.3 Required Personnel

**4.3.1 Engineer:** The FEB shall designate an engineer (by whatever name) who will have responsibility for technical management of the evaluation operations. This person shall have defined and documented authority and responsibility, and must meet the following:

**4.3.1.1** The engineer shall be specifically designated in writing as an authorized signatory to review evaluation reports.

**4.3.1.2** The engineer shall have appropriate qualifications to allow technical judgments regarding the evaluation results for the field of FEB. Qualifications shall be appropriate technical education and/or appropriate professional certification, with at least five years of work experience in the field of electrical evaluation.

**4.3.1.3** The engineer shall physically observe inspectors in the field at an interval not to exceed two years, and documentation shall be maintained of the field observation, including a copy of the report from the inspection observed. Such observation is in addition to field observation by IAS, but may be conducted concurrently.

**4.3.1.4** The engineer and the inspector for any specific inspection cannot be the same person.

**4.3.1.5** The engineer shall review reports issued in the field to assure that the reports are complete and have sufficient and appropriate technical information.

**4.3.2 Inspector:** The FEB shall designate inspector(s) to conduct evaluations. The inspector may be staff or contract personnel. If the inspector is on contract, then the inspector shall be under direct contract to the FEB. Inspectors must have defined and documented responsibilities and authority, and have the following qualifications:

**4.3.2.1** The inspector shall be appropriately trained by the FEB in evaluation techniques, in use of any test and measuring equipment required, and in the FEB's quality management system (QMS), including evaluation procedures. The FEB shall document the inspector's training, and conduct refresher training at an interval not to exceed every two years.

**4.3.2.2** The inspector shall have appropriate experience, in addition to training, to conduct the evaluations in the field. The inspector shall be qualified for specific types of evaluations based on training, experience, and field observations, and the FEB shall maintain records of the qualifications, including the date of qualification.

**4.3.2.3** The inspector shall have documented knowledge of electrical parameters. This shall include AC and DC theory for voltage and current, grounding, ESD (electro-static discharge) protection, electrical safety, test equipment usage (e.g., meters and oscilloscopes), power supplies (high- and low-voltage, switching and non-switching), wiring and labeling protocols, and other electrical parameters as appropriate and necessary for the field of evaluation.

**4.3.2.4** Appropriate professional certification is acceptable as evidence of knowledge of electrical parameters.

### 5.0 TECHNICAL REQUIREMENTS FOR THE FEB

**5.1** The inspection agency shall assure that product(s) evaluated meet all applicable requirements for the location of the evaluation, including local codes and appropriate safety requirements. For electrical evaluations, the document referenced in Section 2.1 of this criteria shall be used, and information documented shall be maintained as a part of the report under Section 6.0.

**5.2** The FEB shall have test and measuring equipment used in the evaluation appropriately calibrated by a calibration provider accredited to ISO/IEC Standard 17025, by an accrediting body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA). Records of the calibrations shall be maintained.

**5.3** Where listed products are utilized in primary or backup power or grounding circuits, or in safety-of-life circuits/applications, or in Emergency Main Off applications, the FEB shall record the part number and/or description, the circuit the item is in, the listing organization (e.g., UL/CSA/FM), and the listing number.

**5.4** The evaluation agency shall have a policy and procedure to observe inspectors in the field prior to qualification. Records of the observation(s) shall be maintained.

**5.5** Digital (electronic) records may be maintained in lieu of hard copies. The FEB must have procedures to assure that once a report is complete it cannot be tampered with, that reports in progress are protected against unauthorized modification, and that reports are backed up (with a copy of the backup to be maintained off-site). Documents may be sent digitally (electronically) so long as protection against subsequent modification of the document is assured. Up-to-date antivirus and similar protection software shall be employed to protect computers giving access to the reports.

**5.6** Subcontracting of evaluations to another organization under this criteria is ~~not allowed.~~ allowed providing the subcontracted organization is also accredited under this criteria. Both FEB organizations must maintain copies of the report, and of the inspector qualifications and training, including refresher training. The engineer employed by the primary FEB must conduct a review of the report.

### 6.0 REQUIRED REPORT INFORMATION

**6.1** Reports shall accurately and clearly outline the results of evaluations. The report must be maintained by the FEB in accordance with record retention time specified in the QMS, but not less than four years. The report must be provided to the responsible person at the location of the evaluation. A copy of the report must be provided to the AHJ upon written request from the AHJ. Report formats may vary, but reports must be easily understandable and readable.

**6.2** Reports shall contain at least the following information:

**6.2.1** Name, address, phone number, designated contact person (e.g., Engineer), and accreditation information (Accreditation Body logo and accreditation number) of the evaluation agency.

**6.2.2** Name, address, phone number, contact information for responsible person(s) at the location of the field evaluation.

**6.2.3** Name, address, phone number, and contact information of the jurisdiction that has inspection responsibility over the final installation site (AHJ).

**6.2.4** The project identifier, which shall be a unique identifier.

**6.2.5** A full description of the product evaluated. Multiple products that are not identical may be included in a single report only if the products collectively constitute an integrated system. However, multiple products may be covered in a single report if the products and installations are identical, specifically authorized by the AHJ, and documented in accordance with Annex A of reference document 2.1.

**6.2.6** If the report is an amended/revised report, the amendment or revision information must be clearly identified.

**6.2.7** Evaluation date(s), and arrival and departure times of the inspector.

**6.2.8** Description of the location and surrounding environment of the product.

**6.2.9** Description of test/inspection equipment used, if any, including calibration due date.

**6.2.10** Results of tests witnessed or performed, including sufficient detail to establish that the installed product complies with specifications, requirements, and/or regulatory requirements (e.g., building code).

**6.2.11** Information pertaining to review of labeling of the installed product, and of any listed components or subsystems. This shall include the listed products identified and recorded as described above.

**6.2.12** The applicable specifications and requirements, including revision information, specific clauses/paragraphs excluded, and local requirements, must be listed.

**6.2.13** Photographs (digital or film) of the product and the applied label, where photographs are possible.

**6.2.14** Evidence that the inspector has checked product traceability to the extent that inspecting traceability is possible.

**6.2.15** Date that the report was prepared.

**6.2.16** Limitation or restriction on product use (e.g., indoor use only).

**6.2.17** A statement that the report addresses only the product described in the report, as the product existed at the time of the inspection.

**6.2.18** Name, title, and signature of the inspector who conducted the evaluation.

**6.2.19** If the inspection is subcontracted, that must be specifically stated, with the accreditation information of the subcontracted organization included.

**6.2.20** ~~19~~ Name, title, and signature of the engineer, upon completion of the review.■