

## Cliff Hansen Intertek

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**From:** Forte, Jim <Jim.Forte@assaabloy.com>  
**Sent:** Tuesday, October 1, 2024 8:05 AM  
**To:** Cliff Hansen Intertek  
**Cc:** Levin, Jonathan; Medeiros, Manny; Wehbe, Paul; DeBiase, Dave; Sullivan, Ryan; Brian Hertz Intertek; Walsh, John  
**Subject:** [External] RE: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED

Good morning Cliff,

Any word on this? Please advise. Thanks!

**James W. Forte, P.E.**  
Regulatory Compliance Project Manager

Access & Door Controls Group  
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**From:** Forte, Jim  
**Sent:** Friday, September 27, 2024 12:45 PM  
**To:** Cliff Hansen Intertek <clifford.hansen@intertek.com>  
**Cc:** Levin, Jonathan <jonathan.levin@assaabloy.com>; Medeiros, Manny <manny.medeiros@assaabloy.com>; Wehbe, Paul <paul.wehbe@assaabloy.com>; DeBiase, Dave <Dave.DeBiase@assaabloy.com>; Sullivan, Ryan <Ryan.Sullivan@assaabloy.com>; Brian Hertz Intertek <brian.hertz@intertek.com>; Walsh, John <John.Walsh@assaabloy.com>  
**Subject:** RE: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED

Cliff,

The Accentra products use two microcontrollers:

Nordic nRF52840  
Renesas R5F100ACASP

I have attached data sheets for both processors.

The Nordic MCU uses an ARM Cortex-M4 processor, has 1 MB flash memory and 256 kB RAM. As we have already determined with the ST MCU, the ARM Cortex family of processors will not run Window, Mac or Linux. And there is not enough memory to run it if it could. So it will not be possible for Kaspersky to be run on this MCU.

The Renesas MCU uses a Renesas RL78 CPU core, which is a 16-bit core, 32 kB flash ROM, 4 kB Data flash, and 2 kB RAM. Kaspersky requires a minimum of 32-bits to run, and again, there is not enough memory to run it if you could.

Please review this with your technical manager to see if this will be sufficient to move forward. Thanks!

**James W. Forte, P.E.**

Regulatory Compliance Project Manager

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**From:** Forte, Jim <[Jim.Forte@assaabloy.com](mailto:Jim.Forte@assaabloy.com)>

**Sent:** Friday, September 27, 2024 11:52 AM

**To:** Cliff Hansen Intertek <[clifford.hansen@intertek.com](mailto:clifford.hansen@intertek.com)>

**Cc:** Levin, Jonathan <[jonathan.levin@assaabloy.com](mailto:jonathan.levin@assaabloy.com)>; Medeiros, Manny <[manny.medeiros@assaabloy.com](mailto:manny.medeiros@assaabloy.com)>; Wehbe, Paul <[paul.wehbe@assaabloy.com](mailto:paul.wehbe@assaabloy.com)>; DeBiase, Dave <[Dave.DeBiase@assaabloy.com](mailto:Dave.DeBiase@assaabloy.com)>; Sullivan, Ryan <[Ryan.Sullivan@assaabloy.com](mailto:Ryan.Sullivan@assaabloy.com)>; Brian Hertz Intertek <[brian.hertz@intertek.com](mailto:brian.hertz@intertek.com)>; Walsh, John <[John.Walsh@assaabloy.com](mailto:John.Walsh@assaabloy.com)>

**Subject:** RE: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED

Cliff,

That is great news! The ST microcontroller is used in the IN120 product, G105838170. The other three projects use the same, but different microcontroller. I will gather the same data for that controller and sent it to you ASAP.

We will be sure to include this data going forward for all microcontrollers we use. Thanks again!

**James W. Forte, P.E.**

Regulatory Compliance Project Manager

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**From:** Cliff Hansen Intertek <[clifford.hansen@intertek.com](mailto:clifford.hansen@intertek.com)>

**Sent:** Friday, September 27, 2024 11:36 AM

**To:** Forte, Jim <[Jim.Forte@assaabloy.com](mailto:Jim.Forte@assaabloy.com)>

**Cc:** Levin, Jonathan <[jonathan.levin@assaabloy.com](mailto:jonathan.levin@assaabloy.com)>; Medeiros, Manny <[manny.medeiros@assaabloy.com](mailto:manny.medeiros@assaabloy.com)>; Wehbe, Paul <[paul.wehbe@assaabloy.com](mailto:paul.wehbe@assaabloy.com)>; DeBiase, Dave <[Dave.DeBiase@assaabloy.com](mailto:Dave.DeBiase@assaabloy.com)>; Sullivan, Ryan <[Ryan.Sullivan@assaabloy.com](mailto:Ryan.Sullivan@assaabloy.com)>; Brian Hertz Intertek <[brian.hertz@intertek.com](mailto:brian.hertz@intertek.com)>; Walsh, John <[John.Walsh@assaabloy.com](mailto:John.Walsh@assaabloy.com)>

**Subject:** RE: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED

Jim,

Thank you for your patience. I just got off the phone with our technical manager. What you sent should be sufficient to show the documentary evidence the FCC has requested. Please confirm this is the same microcontroller for each of the current projects.

Best Regards,

Cliff

---

**From:** Forte, Jim <[Jim.Forte@assaabloy.com](mailto:Jim.Forte@assaabloy.com)>

**Sent:** Thursday, September 26, 2024 2:50 PM

**To:** Cliff Hansen Intertek <[clifford.hansen@intertek.com](mailto:clifford.hansen@intertek.com)>

**Cc:** Levin, Jonathan <[jonathan.levin@assaabloy.com](mailto:jonathan.levin@assaabloy.com)>; Medeiros, Manny <[manny.medeiros@assaabloy.com](mailto:manny.medeiros@assaabloy.com)>; Wehbe, Paul <[paul.wehbe@assaabloy.com](mailto:paul.wehbe@assaabloy.com)>; DeBiase, Dave <[Dave.DeBiase@assaabloy.com](mailto:Dave.DeBiase@assaabloy.com)>; Sullivan, Ryan <[Ryan.Sullivan@assaabloy.com](mailto:Ryan.Sullivan@assaabloy.com)>; Brian Hertz Intertek <[brian.hertz@intertek.com](mailto:brian.hertz@intertek.com)>; Walsh, John <[John.Walsh@assaabloy.com](mailto:John.Walsh@assaabloy.com)>

**Subject:** [External] RE: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED

Cliff,

Please see the attached email from the tech support group for ST, the folks that make the Microcontroller used in our electronic locks. ST confirms that it is physically impossible for the Kaspersky software to run on the microcontroller as there is not enough physical memory to store it. Also, Kaspersky need Windows, Mac or Linux, none of which can be run from the microcontroller.

Finally, they have no idea how or why you would test for something that won't fit on the chip.

Based on this new information, if the microcontroller or microprocessor does not have sufficient memory nor the proper operating system to run Kaspersky, a test would not be warranted.

In conclusion, we feel that there is no risk of Kaspersky being loaded onto our locks and we should be able to move forward with this project. Please review and confirm your agreement. Thanks.

**James W. Forte, P.E.**

Regulatory Compliance Project Manager

Access & Door Controls Group

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**From:** Cliff Hansen Intertek <[clifford.hansen@intertek.com](mailto:clifford.hansen@intertek.com)>

**Sent:** Wednesday, September 25, 2024 2:28 PM

**To:** Forte, Jim <[Jim.Forte@assaabloy.com](mailto:Jim.Forte@assaabloy.com)>

**Cc:** Levin, Jonathan <[jonathan.levin@assaabloy.com](mailto:jonathan.levin@assaabloy.com)>; Medeiros, Manny <[manny.medeiros@assaabloy.com](mailto:manny.medeiros@assaabloy.com)>; Wehbe, Paul <[paul.wehbe@assaabloy.com](mailto:paul.wehbe@assaabloy.com)>; DeBiase, Dave <[Dave.DeBiase@assaabloy.com](mailto:Dave.DeBiase@assaabloy.com)>; Sullivan, Ryan <[Ryan.Sullivan@assaabloy.com](mailto:Ryan.Sullivan@assaabloy.com)>; Brian Hertz Intertek <[brian.hertz@intertek.com](mailto:brian.hertz@intertek.com)>; Walsh, John <[John.Walsh@assaabloy.com](mailto:John.Walsh@assaabloy.com)>

**Subject:** RE: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED

Jim,

You are hitting on the exact same issues we, and the other TCBs, brought up on that call. The answer from the FCC was as soon as the covered list was updated with this, it took effect immediately, meaning this is what they expected was already happening.

So, the short answer is this was in effect since Kaspersky was added in July.

This reminds me of when the FCC sent out their change in requirements for antenna documentation in 2022 that they said we should have understood from the rules yet not one TCB had ever read the rules that way. In that notice, the FCC sent it on August 25<sup>th</sup> saying anything without the added documentation would be dismissed on August 26<sup>th</sup>.

The FCC does not give direct access to individuals. They require everything to go through their KDB inquiry system on their website. These monthly calls and the 2x a year TCB council workshops are the only times we get to have any type of direct communication with them. Had they not brought up their expectations on that call – essentially their reading of what you and I have – we would still be under the impression that what we had been doing was sufficient.

My hands are tied. I don't want to deal with this any more than you do as it has thrown a huge wrench into my entire department right at the end of a fiscal quarter with no warning.

Regards,

Cliff

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**From:** Forte, Jim <[Jim.Forte@assaabloy.com](mailto:Jim.Forte@assaabloy.com)>

**Sent:** Wednesday, September 25, 2024 1:14 PM

**To:** Cliff Hansen Intertek <[clifford.hansen@intertek.com](mailto:clifford.hansen@intertek.com)>

**Cc:** Levin, Jonathan <[jonathan.levin@assaabloy.com](mailto:jonathan.levin@assaabloy.com)>; Medeiros, Manny <[manny.medeiros@assaabloy.com](mailto:manny.medeiros@assaabloy.com)>; Wehbe, Paul <[paul.wehbe@assaabloy.com](mailto:paul.wehbe@assaabloy.com)>; DeBiase, Dave <[Dave.DeBiase@assaabloy.com](mailto:Dave.DeBiase@assaabloy.com)>; Sullivan, Ryan <[Ryan.Sullivan@assaabloy.com](mailto:Ryan.Sullivan@assaabloy.com)>; Brian Hertz Intertek <[brian.hertz@intertek.com](mailto:brian.hertz@intertek.com)>; Walsh, John <[John.Walsh@assaabloy.com](mailto:John.Walsh@assaabloy.com)>

**Subject:** [External] RE: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED

**Importance:** High

Cliff,

Did the FCC state WHEN they expected you to implement this? Isn't it totally unreasonable to drop it on all of us with ZERO time to figure out what needs to be done? As there are millions if not billions of products already out in the field that were not tested for this software, what is the point of ramming this down our throats without some time to come up with a good plan?

Who was on the call from the FCC? That needs to be my next stop in this fiasco. Thanks.

**James W. Forte, P.E.**

Regulatory Compliance Project Manager

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**From:** Cliff Hansen Intertek <[clifford.hansen@intertek.com](mailto:clifford.hansen@intertek.com)>

**Sent:** Wednesday, September 25, 2024 1:37 PM

**To:** Forte, Jim <[Jim.Forte@assaabloy.com](mailto:Jim.Forte@assaabloy.com)>

**Cc:** Levin, Jonathan <[jonathan.levin@assaabloy.com](mailto:jonathan.levin@assaabloy.com)>; Medeiros, Manny <[manny.medeiros@assaabloy.com](mailto:manny.medeiros@assaabloy.com)>; Wehbe, Paul <[paul.wehbe@assaabloy.com](mailto:paul.wehbe@assaabloy.com)>; DeBiase, Dave <[Dave.DeBiase@assaabloy.com](mailto:Dave.DeBiase@assaabloy.com)>; Sullivan, Ryan <[Ryan.Sullivan@assaabloy.com](mailto:Ryan.Sullivan@assaabloy.com)>; Brian Hertz Intertek <[brian.hertz@intertek.com](mailto:brian.hertz@intertek.com)>

**Subject:** RE: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED

Jim,

The TCB Council, which is a body made up of all the TCBs, has a monthly call scheduled with the FCC which gets cancelled nearly half the time, so the first call we had after the addition of Kaspersky was the September call.

The FCC wanted to make sure we were all clear on what they meant by “Per this determination, if, in evaluating an application for compliance with this prohibition, the TCB has reason to believe that the subject equipment is or may be “covered,” equipment (i.e., hardware with integrated Kaspersky cybersecurity or anti-virus software), the equipment should not be authorized.”

They wanted to make sure we understood this meant they expected us to actively check for this software for all devices. When one of the other TCBs brought up the attestation, the FCC emphatically stated that was not enough. When the Intertek technical manager brought up doing a “reasonable check” similar to the expectations associated with the rest of the covered list – things such as looking up the companies to ensure they did not show as a subsidiary of one of the companies, etc. – the FCC again emphatically stated that was insufficient and said they expected us to test.

When yet another TCB brought up how there are many devices where this did not make sense as they are simple RFID devices without such software, that is when the FCC brought up the garage door opener example I mentioned in my earlier email.

From the Intertek standpoint, you do not have to utilize Intertek for this validation, but we have to have a third party verification that the device was evaluated in an appropriate manner to ensure there is no such software in the device.

Because this is a requirement that is outside of the scope of anything we have seen, and Intertek tests/certifies just about everything that can be tested or certified, we wanted to provide an option for all of our clients.

There is no aspect of this requirement that comes from me or from anyone inside Intertek or even anyone inside any TCB. This is 100% from the FCC. Prior to that call with the FCC, we (every TCB) was under the impression this addition of Kaspersky would be handled in a similar fashion to the other entities as explained above.

Best Regards,

Cliff

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**From:** Forte, Jim <[Jim.Forte@assaabloy.com](mailto:Jim.Forte@assaabloy.com)>

**Sent:** Wednesday, September 25, 2024 12:17 PM

**To:** Cliff Hansen Intertek <[clifford.hansen@intertek.com](mailto:clifford.hansen@intertek.com)>

**Cc:** Levin, Jonathan <[jonathan.levin@assaabloy.com](mailto:jonathan.levin@assaabloy.com)>; Medeiros, Manny <[manny.medeiros@assaabloy.com](mailto:manny.medeiros@assaabloy.com)>; Wehbe, Paul <[paul.wehbe@assaabloy.com](mailto:paul.wehbe@assaabloy.com)>; DeBiase, Dave <[Dave.DeBiase@assaabloy.com](mailto:Dave.DeBiase@assaabloy.com)>; Sullivan, Ryan <[Ryan.Sullivan@assaabloy.com](mailto:Ryan.Sullivan@assaabloy.com)>; Brian Hertz Intertek <[brian.hertz@intertek.com](mailto:brian.hertz@intertek.com)>

**Subject:** [External] RE: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED

Cliff,

I have read the attached documents from the FCC and the Department of Commerce as well as your email below. I am trying to understand where the new Cybersecurity testing requirement is coming from? The FCC document states the following about Kaspersky Lab:

**“2a. How should TCBs address applications for authorization of equipment that includes cybersecurity and anti-virus software produced or provided by Kaspersky Lab, Inc. or any of its successors and assignees?** In its Final Determination: Case No. ICTS-2021-002, Kaspersky Lab, Inc., the Commerce Department found, among other things, that “Kaspersky’s provision of cybersecurity and anti-virus software to U.S. persons, including through third-party entities that integrate Kaspersky cybersecurity or anti-virus software into commercial hardware or software, poses undue and unacceptable risks to U.S. national security and to the security and safety of U.S. persons.” Accordingly, the Covered List was updated to add Kaspersky cybersecurity and anti-virus software, pursuant to the Secure and Trusted Communications Networks Act of 2019. Per this determination, if, in evaluating an application for compliance with this prohibition, the TCB has reason to believe that the subject equipment is or may be “covered,” equipment (i.e., hardware with integrated Kaspersky cybersecurity or anti-virus software), the equipment should not be authorized. The TCB should NOT process for authorization such equipment as it is “covered” and thus prohibited from authorization under the Commission’s current equipment authorization rules.”

According to the above, as long as our products do not include cybersecurity and anti-virus software produced or provided by Kaspersky Lab, Inc. then we are fine. As our products do not any software from Kaspersky, why is any additional evaluation required? Where are the published rules from the FCC requiring the TCB to verify this by test? We should not be held to new, unpublished requirements based on a telephone conversation with the FCC. Once the FCC officially goes on record we can pursue this. In they mean time, you should proceed under existing rules.

Please comment.

**James W. Forte, P.E.**

Regulatory Compliance Project Manager

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**From:** DeBiase, Dave <[dave.debiase@assaabloy.com](mailto:dave.debiase@assaabloy.com)>  
**Sent:** Wednesday, September 25, 2024 9:43 AM  
**To:** Forte, Jim <[Jim.Forte@assaabloy.com](mailto:Jim.Forte@assaabloy.com)>; Sullivan, Ryan <[Ryan.Sullivan@assaabloy.com](mailto:Ryan.Sullivan@assaabloy.com)>  
**Cc:** Levin, Jonathan <[jonathan.levin@assaabloy.com](mailto:jonathan.levin@assaabloy.com)>; Medeiros, Manny <[manny.medeiros@assaabloy.com](mailto:manny.medeiros@assaabloy.com)>; Wehbe, Paul <[paul.wehbe@assaabloy.com](mailto:paul.wehbe@assaabloy.com)>  
**Subject:** FW: [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED  
**Importance:** High

Just in from Intertek. See below and attached for your reading pleasure!

Regards

**David DeBiase**  
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**From:** Brian Hertz Intertek <[brian.hertz@intertek.com](mailto:brian.hertz@intertek.com)>  
**Sent:** Wednesday, September 25, 2024 9:34 AM  
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**Cc:** Cliff Hansen Intertek <[clifford.hansen@intertek.com](mailto:clifford.hansen@intertek.com)>  
**Subject:** [EXT] URGENT TCB UPDATE - QUOTING ACTION REQUIRED  
**Importance:** High

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Good morning-

As you may or may not be aware, the FCC made changes to requirements regarding certification involving certain entities due to them being deemed a national security threat back in early 2023.

There has been a recent change to this adding a software company to the list. That change is represented in section 2.a. of the attachment. For the other aspects of the Covered List, the FCC previously allowed us to use an attestation from the client along with due diligence associated with anything that may be a red flag – i.e. a email address with one of the restricted company’s names.

However, on a recent call with the FCC, they made very clear that for this software there needs to be actual testing to confirm it is not installed. This must go beyond just looking at a directory of software, which means it goes beyond what we can do within our EMC and radio labs.

For this reason, we have been working with our CyberLAB partners up in Canada to work something out where they can do the needed testing and produce a deliverable sufficient to meet this FCC requirement.

I am sure you will have additional questions, so please feel free to reach out with any of these. Cliff and I will schedule calls as needed to address these.

Again, this is not something we have any control over. This is entirely at the direction of the FCC including the short notice. We apologize for any inconvenience. The list of Sargent projects affected are below:

Sargent Mfg Co	G105779713	FCC/IC Cert
Sargent Mfg Co	G105779772	FCC/IC Cert
Sargent Mfg Co	G105779861	FCC/IC Eval
Sargent Mfg Co	G105838170	FCC/IC Cert

Regards,

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**Sales Executive**  
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