

	DEPARTMENT OF COMMERCE National Institute of Standards and Technology National Voluntary Laboratory Accreditation Program	ISSUE DATE: March 6, 1998
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SUBJECT: Clarification of the "Tamper-Resistant System" Requirement for FQA Test Reports		

Since the Fastener Quality Act (FQA) implementing regulations were published in September 1996, NVLAP has received many questions about the requirement for test reports to be protected by a tamper-resistant system (NIST Handbook 150-18, Section 285.33(k)(1)). FQA regulations define *tamper-resistant system* as: "The use of special paper or embossing stamps or other controls which discourage, prevent or minimize alteration of test reports subsequent to manufacturing, inspection and testing."

Some examples of acceptable tamper-resistant systems include:

1. uniquely watermarked paper;
2. paper on which other security features have been applied (e.g., paper used for checks and bank drafts);
3. uniquely designed embossing stamps; or
4. the signature of a notary public with an official stamp and seal.

This is not intended to be a complete list of acceptable tamper-resistant systems; it is simply meant to provide some guidance on a frequently misunderstood requirement.

On the other hand, there are some methods which do not meet the tamper-resistant system requirement. Methods such as the use of colored paper, or the use of a rubber ink stamp are unacceptable and shall not be used. These types of systems do not provide a sufficient deterrent to discourage the reproduction of a test report.

The current definition of a tamper-resistant system leaves the door open for future innovative methods for producing authentic test reports. Any method other than those discussed above should be submitted for approval to NVLAP prior to its use.

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