<table>
<thead>
<tr>
<th><strong>DOCKETED</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Docket Number:</strong></td>
</tr>
<tr>
<td><strong>Project Title:</strong></td>
</tr>
<tr>
<td><strong>TN #:</strong></td>
</tr>
<tr>
<td><strong>Document Title:</strong></td>
</tr>
<tr>
<td><strong>Description:</strong></td>
</tr>
<tr>
<td><strong>Filer:</strong></td>
</tr>
<tr>
<td><strong>Organization:</strong></td>
</tr>
<tr>
<td><strong>Submitter Role:</strong></td>
</tr>
<tr>
<td><strong>Submission Date:</strong></td>
</tr>
<tr>
<td><strong>Docketed Date:</strong></td>
</tr>
</tbody>
</table>
Amendment #1 Revision 2

Due to continuing scheduling conflicts, the unforeseen circumstances created by COVID-19, and ongoing concerns of NLCAA’s Field Inspection process, NLCAA is requesting the addition of a Field Audit Process.

NLCAA is requesting to utilize this new Field Audit process for past due Field Inspections that have not been able to be completed.

Revision to “NLCAA Application to the CEC - Rev 05 - 5/01/19”

- Page 16-17
- Attachment 4 – Page 1-2
- NLCAA Appendix 2 - Page 1 of 2
- Appendix 3 - Page 1 of 1

Reasoning and Impact:

Adding a Field Audit:
Field Inspections have not been able to be completed due to scheduling conflicts and the circumstances created by COVID-19.

This new procedure frees the ATT from the obligation of being onsite during the oversight procedure and lessens scheduling burdens for the ATT, ATE and ATTCP. A potential negative impact is that the ATT will receive less mentoring in this process since they are not required to be onsite during the audit. To combat this issue, we have left the option for Field Inspections available.

The new Field audit process increases compliance with the ATTCP application and oversight procedures by reducing scheduling burdens and reducing the amount of people onsite at one time to better comply with COVID-19 protocols that may be set up at the various project locations.

Change when Field Audit is due from 1-25th job to 1-4th job after recertification:
In the Field Inspection process, NLCAA had to schedule and coordinate the Inspection with the ATT, so we needed a bigger window to schedule. With the new Field Audit process, scheduling will be simpler, and we can get it done within a smaller project time frame.

This should not cause any major impact to the ATT, ATE or ATTCP.
Quality Assurance and Accountability

Compliance process evaluation by NLCAA shall take the form of a Desk Audit, Field Audit, or a Field Inspection.

The Desk Audit process allows NLCAA directors or their agents to review Acceptance testing forms for signs of “irregularities” or “inconsistencies” as determined by NLCAA directors or their agents.

Desk Audits allow comparisons between Audit Forms submitted for a job and Acceptance testing forms submitted for the same job.

The Desk Audits are done at project level and will cover the compliance form requirements of the code.

A “Field Inspection” is a “(visit) to (a) building site where certified technicians are completing acceptance tests, § 10-103.1 (c) 3. F. This site visit shall be arranged by an Acceptance Test Technician Employer for the Field technician under inspection. This “Field Inspection” should occur on the next possible occasion after the Employer has been notified by telecommunications. A Field Inspection will consist of a minimum 2-hour site visit during which the Field Technician performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. In addition: any or all of the following may occur; verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the Acceptance Test Technician(s) performing acceptance tests.

A Field Audit consists of a building site visit during which an NLCAA approved auditor compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests. The NLCAA approved auditor will have a Field Audit checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

This Field Audit should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Audit is required. The ATE and ATT are encouraged, but not required, to be onsite during the Field Audit.
Oversight Procedures

Per our CEC application to become an approved ATTCP, NLCAA oversees the ATEs and ATTs in two ways. These are Desk Audits, Field Audits, and Field Inspections.

Field Inspections:

A Field Inspection consists of a minimum 2-hour building site visit during which the ATT performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. The Field Inspection may include, but not be limited to, any of the following: verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

This Field Inspection should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Inspection is required. The ATE is encouraged, but not required, to be onsite during the Field Inspection.

The NLCAA approved inspector will have a Field Inspection checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

“At NLCAA we use the Field Inspections as a mentoring tool. NLCAA strives to continue teaching in any way we can. While the representative is in the field with the ATT, it is NLCAA’s goal to not only complete the required Field Inspection, but to also find ways of helping and improving the ATT’s testing capabilities whether they are just starting out or are seasoned testers.”

- Michael Scalzo, Executive Director

Field Inspection Process:

NLCAA or their agents will require a Field Inspection to be conducted according to the following schedule:

- ATT’s 2nd to 5th project after certification.
- A random sample of no less than 1% of each ATT’s completed projects.*
- ATT’s 1st to 25th job after recertification (not to be the same project as a Desk Audit).
  *The Random Sample will be conducted using the Pseudo Random Number Generator (PRNG)

Pseudo Random Number Generator (PRNG) refers to an algorithm that uses mathematical formulas to produce sequences of random numbers. PRNGs generate a sequence of numbers approximating the properties of random numbers.

Field Inspections will be required as determined by NLCAA.

A Field Inspection can be conducted in lieu of a Field Audit and/or as a disciplinary action from a failed Oversight process.
Field Inspections may also be completed upon request of an ATT and/or ATE who would like guidance during the Acceptance Testing process.

Step 1: ATT hits the trigger to initiate a Field Inspection per the Oversight Procedures.

Step 2: NLCAA or its agent notifies the ATE and/or ATT that a Field Inspection is required to be scheduled on the next possible project.

Step 3: The ATT and/or ATE must schedule the Field Inspection and pay applicable fees to NLCAA.

Step 4: Approved NLCAA inspector conducts the Field Inspection with the ATT (the ATE is encouraged, but not required, to be onsite during Inspection). The inspector completes the Field Inspection checklist and submits it to the NLCAA database.

If the results are deemed unsatisfactory by the Inspector, the Checklist will be reviewed by the NLCAA Executive Director for further actions.

Step 5: The ATT and/or ATE will be notified of the Inspection results within twenty days after completion.

If the results are deemed unsatisfactory by the Executive Director, a second Field Inspection or Complaint Procedure may be required with applicable fees.

Step 6: If, after a secondary Field Inspection is conducted, the results are still unsatisfactory, the NLCAA inspector and/or Executive Director will initiate the Complaint Procedure with applicable fees.

Field Audits:

A Field Audit consists of a building site visit during which an NLCAA approved auditor compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

This Field Audit should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Audit is required. The ATE and ATT are encouraged, but not required, to be onsite during the Field Audit.

The NLCAA approved auditor will have a Field Audit checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

Field Audit Process:

NLCAA or their agents) will require a Field Audit to be conducted according to the following schedule:

- Between the ATT’s 2nd-5th project after certification.
- A random sample of no less than 1% of each ATT’s completed projects.
  
  3301 E. Hill St. Unit 408, Signal Hill, CA 90755; (562) 485-9144; www.NLCAA.org
• Between the ATT's 1st-4th job after recertification (not to be the same project as a Desk Audit).

*The Random Sample will be conducted using the Pseudo Random Number Generator (PRNG)

Pseudo Random Number Generator (PRNG) refers to an algorithm that uses mathematical formulas to produce sequences of random numbers. PRNGs generate a sequence of numbers approximating the properties of random numbers.

Step 1: ATT hits the trigger to initiate a Field Audit per the Oversight Procedures.

Step 2: NLCAA or its agent(s) notifies the ATE and/or ATT that a Field Audit is required on a completed project.

Step 3: The ATT and/or ATE must pay applicable fees to NLCAA.

Step 4: Approved NLCAA auditor conducts the Field Audit (the ATE and ATT are encouraged but not required, to be onsite during the Audit). The auditor completes the Field Audit checklist and submits it to the NLCAA database.

If the results are deemed unsatisfactory by the Auditor, the Checklist will be reviewed by the NLCAA Executive Director for further actions.

Step 5: The ATT and/or ATE will be notified of the Audit results within twenty days after completion.

If the results are deemed unsatisfactory by the Executive Director, a second Field Audit, a Field Inspection or Complaint Procedure may be required with applicable fees.

Step 6: If, after a secondary Field Audit or Inspection is conducted, the results are still unsatisfactory, the NLCAA auditor and/or Executive Director will initiate the Complaint Procedure with applicable fees.

“NLCAA Application to the CEC Rev 05 5/01/19” - NLCAA Appendix 2 - Page 1 of 2

Definitions

Field Inspection

A Field Inspection consists of a minimum 2-hour building site visit during which the ATT performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. The Field Inspection may include, but not be limited to, any of the following: verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

Field Audit

A Field Audit consists of a building site visit during which an NLCAA approved auditor compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results.
The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.


“NLCAA Application to the CEC - Rev 05 - 5/01/19” - Appendix 3 - Page 1 of 1

NLCAA FEE SCHEDULE

The charge for a Field Inspection is: $500

The charge for a Field Audit is: $500
Updated Application:

“NLCAA Application to the CEC Rev 05 5/01/19” - Page 16-17

Quality Assurance and Accountability

... Compliance process evaluation by NLCAA shall take the form of a Desk Audit, Field Audit, or a Field Inspection.

The Desk Audit process allows NLCAA directors or their agents to review Acceptance testing forms for signs of “irregularities” or “inconsistences” as determined by NLCAA directors or their agents.

Desk Audits allow comparisons between Audit Forms submitted for a job and Acceptance testing forms submitted for the same job.

The Desk Audits are done at project level and will cover the compliance form requirements of the code.

A “Field Inspection” is a “(visit) to (a) building site where certified technicians are completing acceptance tests, § 10-103.1 (c) 3. F. This site visit shall be arranged by an Acceptance Test Technician Employer for the Field technician under inspection. This “Field Inspection” should occur on the next possible occasion after the Employer has been notified by telecommunications. A Field Inspection will consist of a minimum 2-hour site visit during which the Field Technician performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. In addition: any or all of the following may occur; verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the Acceptance Test Technician(s) performing acceptance tests.

A Field Audit consists of a building site visit during which an NLCAA approved auditor compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests. The NLCAA approved auditor will have a Field Audit checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

This Field Audit should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Audit is required. The ATE and ATT are encouraged, but not required, to be onsite during the Field Audit.

...
Oversight Procedures

Per our CEC application to become an approved ATTCP, NLCAA oversees the ATEs and ATTs in three ways. These are Desk Audits, Field Audits, and Field Inspections.

Field Inspections:

A Field Inspection consists of a minimum 2-hour building site visit during which the ATT performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. The Field Inspection may include, but not be limited to, any of the following: verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

This Field Inspection should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Inspection is required. The ATE is encouraged, but not required, to be onsite during the Field Inspection.

The NLCAA approved inspector will have a Field Inspection checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

“At NLCAA we use the Field Inspections as a mentoring tool. NLCAA strives to continue teaching in any way we can. While the representative is in the field with the ATT, it is NLCAA’s goal to not only complete the required Field Inspection, but to also find ways of helping and improving the ATT’s testing capabilities whether they are just starting out or are seasoned testers.”

- Michael Scalzo, Executive Director

Field Inspection Process:

Field Inspections will be required as determined by NLCAA.

A Field Inspection can be conducted in lieu of a Field Audit and/or as a disciplinary action from a failed Oversight process.

Field Inspections may also be completed upon request of an ATT and/or ATE who would like guidance during the Acceptance Testing process.

Step 1: ATT hits the trigger to initiate a Field Inspection per the Oversight Procedures.

Step 2: NLCAA or its agent notifies the ATE and/or ATT that a Field Inspection is required to be scheduled on the next possible project.

Step 3: The ATT and/or ATE must schedule the Field Inspection and pay applicable fees to NLCAA.
Step 4: Approved NLCAA inspector conducts the Field Inspection with the ATT (the ATE is encouraged, but not required, to be onsite during Inspection). The inspector completes the Field Inspection checklist and submits it to the NLCAA database.

If the results are deemed unsatisfactory by the Inspector, the Checklist will be reviewed by the NLCAA Executive Director for further actions.

Step 5: The ATT and/or ATE will be notified of the Inspection results within twenty days after completion.

If the results are deemed unsatisfactory by the Executive Director, a second Field Inspection or Complaint Procedure may be required with applicable fees.

Step 6: If, after a secondary Field Inspection is conducted, the results are still unsatisfactory, the NLCAA inspector and/or Executive Director will initiate the Complaint Procedure with applicable fees.

Field Audits:

A Field Audit consists of a building site visit during which an NLCAA approved auditor compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

This Field Audit should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Audit is required. The ATE and ATT are encouraged, but not required, to be onsite during the Field Audit.

The NLCAA approved auditor will have a Field Audit checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

Field Audit Process:

NLCAA or their agent(s)

will require a Field Audit to be conducted according to the following schedule:

- Between the ATT’s 2nd-5th project after certification.
- A random sample of no less than 1% of each ATT’s completed projects. *
- Between the ATT’s 1st-4th job after recertification (not to be the same project as a Desk Audit).

*The Random Sample will be conducted using the Pseudo Random Number Generator (PRNG)

Pseudo Random Number Generator (PRNG) refers to an algorithm that uses mathematical formulas to produce sequences of random numbers. PRNGs generate a sequence of numbers approximating the properties of random numbers.
Step 1: ATT hits the trigger to initiate a Field Audit per the Oversight Procedures.

Step 2: NLCAA or its agent(s) notifies the ATE and/or ATT that a Field Audit is required on a completed project.

Step 3: The ATT and/or ATE must pay applicable fees to NLCAA.

Step 4: Approved NLCAA auditor conducts the Field Audit (the ATE and ATT are encouraged but not required, to be onsite during the Audit). The auditor completes the Field Audit checklist and submits it to the NLCAA database.

If the results are deemed unsatisfactory by the Inspector, the Checklist will be reviewed by the NLCAA Executive Director for further actions.

Step 5: The ATT and/or ATE will be notified of the Audit results within twenty days after completion.

If the results are deemed unsatisfactory by the Executive Director, a second Field Audit, a Field Inspection or Complaint Procedure may be required with applicable fees.

Step 6: If, after a secondary Field Audit or Inspection is conducted, the results are still unsatisfactory, the NLCAA auditor and/or Executive Director will initiate the Complaint Procedure with applicable fees.

"NLCAA Application to the CEC Rev 05 5/01/19" - NLCAA Appendix 2 - Page 1 of 2

Definitions

Field Inspection

A Field Inspection consists of a minimum 2-hour building site visit during which the ATT performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. The Field Inspection may include, but not be limited to, any of the following: verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

Field Audit

A Field Audit consists of a building site visit during which an NLCAA approved auditor compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

...
NLCAA FEE SCHEDULE

The charge for a Field Inspection is: $500

The charge for a Field Audit is: $500