



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

SEP 9 2014

Mr. Mark Lary
Director of Regulatory Affairs &
Field Technical Support
Lifeloc Technologies, Inc.
12441 West 49th Avenue, Unit 4
Wheat Ridge, CO 80033

Dear Mr. Lary:

This letter confirms that Lifeloc Technologies, Inc. submitted the **FC 10, FC10^{Plus}, FC20BT, EV30, and Phoenix 6.0BT** for conformance testing as evidential breath testers (EBTs) with the **EASYCAL[®]** calibration station accessory.

These devices, as well as the FC20 and the Phoenix 6.0 (without the **EASYCAL[®]** accessory) had previously been evaluated by the Volpe Transportation Systems Center, found to meet the model specifications for EBT devices, and been included on the conforming products list (CPL) for EBTs.

You recently submitted the five devices listed above (with the **EASYCAL[®]** accessory) to determine whether they continue to conform with the Model Specifications for EBTs, when calibrated using **EASYCAL[®]**. **EASYCAL[®]** is not a calibrating unit. Rather, it uses dry gas calibration tanks from the NHTSA CPL of calibration units for breath alcohol testers to check and calibrate Lifeloc's specific EBTs.

The **FC 10, FC10^{Plus}, FC20BT, EV30, and Phoenix 6.0BT** EBTs were re-evaluated for precision and accuracy following interface with the **EASYCAL[®]** calibration station accessory. (The **FC20** and the **Phoenix 6.0** are essentially the same devices as the **FC 20BT** and the **Phoenix 6.0BT**, respectively, except the latter two devices include wireless Bluetooth[®] capability. Accordingly, the **FC20** and the **Phoenix 6.0** did not need to be re-evaluated separately.) The **EV30** was selected as representative of all seven Lifeloc units, and was re-evaluated under the environmental tests contained in the Model Specifications. Based on these tests, we have determined that all seven EBTs with the **EASYCAL[®]** calibration station accessory conform to the Model Specifications for EBTs. Enclosed is a copy of the evaluation report. All seven devices with the optional **EASYCAL[®]** accessory will be included in the next update of the CPL for EBTs.

In order for these devices to be used as a breath alcohol measuring instrument by workers in the U.S. Department of Transportation workplace testing program, a quality assurance plan (QAP) must be approved by NHTSA, as required by 49 CFR Part 40, "Procedures for Transportation Drug and Alcohol Testing Program" (59 FR 7340). The QAP requires users to calibrate your

equipment following your device's instruction, and the instructions provided by the manufacturer of a calibrating unit listed on the CPL for calibrating units. We have reviewed the QAP dated May 28, 2014 for the **FC 10, FC10^{Plus}, FC20, FC20BT, EV30, Phoenix 6.0, and Phoenix 6.0BT** with the **EASYCAL[®]** accessory and are pleased to inform you that this submission has been approved.

We will place this QAP on file at NHTSA, together with a copy of this letter for interested agencies. A copy will also be provided to the U.S. Department of Transportation Office of Drug and Alcohol Policy and Compliance for their records.

Please be advised that this office is to be notified immediately of any revisions or modifications to the accessory, devices, or the QAP.

If you require further assistance or have any questions regarding NHTSA's quality assurance program in relation to 49 CFR Part 40, please do not hesitate to contact me at 202-366-1694.

Sincerely,



J. De Carlo Ciccel
Program Analyst

Enclosures

CC: Patrice Kelly, OST
Edward Conde, Volpe