

Idaho State Police Forensic Services Timeline Outline for FC20BT Documentation

- March 11, 2010, the National Highway Traffic Safety Administration (NHTSA) updated the Conforming Products List (CPL) of breath alcohol instruments by publishing it in the federal register (attached as [2010-5242.pdf](#)). This register listed the Lifeloc FC20 breath testing instrument that ISPFSS had authorized at the time.
- August 9, 2010, Lifeloc Corporation had email dialog with NHTSA and Volpe (a NHTSA contractor performing testing of instrumentation) about the Lifeloc FC20BT. This instrument was not a different platform, but added the functionality of Bluetooth technology mainly for printing. In the approval of the FC20BT, Lifeloc informed NHTSA that they were adding the BT designation to the model number to designate the unit as a Bluetooth version of the FC20 model of breath testing instrument. Lifeloc Technologies Inc. submitted the BT version of the FC20 to NHTSA for evaluation and inclusion on the conforming products list. NHTSA program manager DeCarlo Ciccel responded to Lifeloc Technologies that it was not a material change and that they still considered the FC20 and FC20BT on the CPL. This is significant since NHTSA recognizes the FC20 and FC20BT as the same unit and would fall under the same designation status under the 2010 CPL. Even though the CPL was not published in the federal register again at that point, the documentation has been provided (attached as [Bluetooth notification.pdf](#)). It should be noted that Idaho State Police Forensic Services (ISPFSS) had not approved the FC20BT for use in Idaho at this point.
- April 7, 2011, ISPFSS updated IDAPA 11.03.01 and incorporated by reference the CPL from the federal register dated March 11, 2010.
- June 14, 2012, the CPL was updated by NHTSA on the federal register. It still listed the FC20 and did not list the FC20BT. ISPFSS did not update the IDAPA incorporation by reference at this time because there was no change in the FC20 reference on the federal register and ISPFSS had not adopted the FC20BT. The documentation of the 2012 federal had not approved the FC20BT for use in Idaho at this point. The 2012 register has been provided (attached as [CPL June 2012.pdf](#))
- September 9, 2014, NHTSA sent a letter to Lifeloc Technologies approving the FC20 and FC20BT to be on the CPL when used with the Lifeloc EasyCal unit and dry gas calibration standards. They reaffirmed that the FC20 and FC20BT were not materially different and approved both for the CPL. As noted in the document, NHTSA indicates that these units have already been evaluated and have already been included on the CPL (reference paragraph 2). Paragraph three emphasizes the point by reiterating that the FC20 and FC20BT are “essentially the same device(s)” and that they need not both be evaluated separately. This is significant because NHTSA recognized the fact that the FC20 and FC20BT are the same unit functionally to the point that they don’t require separate evaluations for inclusion on the conforming products list. It should be noted that NHTSA did not update the CPL on the federal register at this time. This letter is provided (attached as [NHTSA final ltr 9 Sep.pdf](#))
- February 17, 2015, NHTSA sent a letter to Lifeloc Technologies confirming receipt of instruments that were sent in for evaluation after changes were made to dry gas compensation setting, printer drivers, operator selection settings, database size allocation, and dry gas information confirmation upon reboot. In this document, NHTSA again states that the FC20BT have previously been evaluated and have been included on the conforming products list (CPL) for evidential breath testing devices. This is significant because in paragraph 2 of the document, NHTSA continues to emphasize the fact that they recognize the FC20BT falling under the FC20 designation on the CPL. This letter is provided (attached as [NHTSA 2015 to lifeloc for](#)

[FC20BT.pdf](#)). Again, it should be noted that ISPFS had not approved the FC20BT for use in Idaho at this point.

- June 1, 2015, ISPFS issued a memo documenting that a validation study had been performed and approved by ISPFS and approving the FC20BT for evidentiary testing within the state of Idaho. ISPFS moved to the new FC20BT because Lifeloc Technologies indicated that the FC20 base model was being phased out in favor of the FC20BT model. ISPFS performed the validation as a check to ensure that the FC20BT instrument functioned the same as the FC20. The FC20BT was added to ISPFS documentation, training programs, manuals, methods, protocols, and procedures as a version of the FC20 instrument. This document is significant because it does not designate the unit as a new model, but only a new version of the FC20, designated the FC20BT. It references the new Bluetooth board (the rev 7 board), and then lists the new software additions to the FC20 units. It also reiterates that ISPFS believed that NHTSA had placed it on the CPL based in the February 2015 documentation from NHTSA. The ISPFS approval memo is provided (attached as [FC20BT rev 7 approval memo.pdf](#)).
- December 14, 2017, ISPFS adopted a temporary rule change updating the incorporation by reference in IDAPA 11.03.01 to the new 11/2/2017 version of the NHTSA CPL published in the federal register. This CPL revision lists the FC20 and FC20BT with or without the EasyCal. This document is provided (attached as [2017-23869.pdf](#)).