

**Innovation, Science and Economic Development Canada
Spectrum Management and Telecommunications**

**Consultation on New Requirements for Wireless Device Testing Laboratories
SMSE-011-17**

October 20, 2017

Comments of Cisco Systems, Inc.

I. Introduction and Summary

Cisco Systems, Inc. (“Cisco”) hereby submits comments on the above captioned consultation, published in the Canada Gazette on Sept. 9, 2017.¹ In the consultation, Innovation, Science and Economic Development Canada (hereinafter “the Department” or “ISED”) requests comment on conformity assessment related to wireless equipment certification, also known as Category 1 equipment. The specific issues are: (1) how ISED recognizes accreditation bodies and performance of accreditation on testing laboratories in countries not subject to a Mutual Recognition Agreement; (2) changes to ISO/IEC 17025 that speak to general requirements of testing and calibration laboratories; and (3) assuming rules changes, the transition period that should apply and the renewal period for the accreditation of testing laboratories. Cisco generally supports the proposals in the consultation, although we recommend a slightly longer transition time before new rules take effect.

¹ Canada Gazette, Part 1, September 9, 2017, Consultation on New Requirements for Wireless Device Testing Laboratories, SMSE-011-17 at <http://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf11327.html>.

Cisco is a leading manufacturer of unlicensed devices, primarily Wi-Fi access points. Cisco maintains several Accredited EMC and Wireless test labs including an Over the Air Test Chamber (OTA). Further, our laboratories are currently accredited for testing EMC and wireless devices in Canada as they routinely test products for compliance to Canadian regulations. A number of Cisco test personnel are iNARTE certified and before any engineer can perform a compliance testing in our labs, he or she must first go through training and successfully meet the requirements to perform such testing.

Cisco supports the Department's attention to the conformity assessment regime, including updates to test lab requirements, accreditation, and qualifications. This is important to ensure that testing is done in facilities capable of testing newer wireless technologies and that these facilities have qualified and trained staff to perform such testing.

Question A-1. The Consultation, after noting the important role of Mutual Recognition Agreements ("MRA") in support of conformity testing, raises the issue of accrediting labs in countries that currently do not have an MRA with Canada. In Appendix A, ISED presents a proposed procedure to recognize accreditation bodies in non-MRA countries. Cisco has reviewed the procedures, and supports the transparency with which ISED proposes to manage accreditation bodies. The procedure notes that should an accreditation body lose its recognition by Canada, temporarily or permanently, then the accreditation body will be removed from the list of recognized accreditation bodies on the ISED web site. From a manufacturer's perspective, we would not be dealing with the accreditation body, but would have a relationship with the test labs accredited by that now-unrecognized accreditation body. It is therefore important for ISED not to

just remove the name of the entity that lost accreditation but also make clear that the entity has been removed through the issuance of a public notice or in some notable way on the website. That will assist manufacturers in monitoring the status of the testing labs that they are using which may be affected by the loss of accreditation.

Questions B – 1, 2, 3. The Department is also proposing to strengthen its conformity assessment regime by requiring testing labs to be accredited to the latest ISO/IEC 17025 by a recognized accreditation body, and recognized by ISED to perform measurements specific to the Radio Standards Specifications (RSS), provided at Appendix B. Both Canadian and foreign labs will be subject to the same requirements. The updated rules also require the accreditation body to perform a technical assessment checklist, provided at Appendix C. Conforming amendments to other documents are listed in Appendix D. Cisco has reviewed the attachments and we support the requirements as spelled out in Annex B, C, and D as they appear to be reasonable and align well with conformity assessment norms.

Questions C-1, 2. ISED is proposing a minimum scope of accreditation based on its RSS publications,² so that a test lab could choose to be accredited to perform conformity assessments pursuant to RSS general requirements (RSS-GEN) and a specialized RSS, such as RSS-247 for radio local area network equipment. ISED notes that the RSS-102³ specification is unique in that it does not reference RSS-GEN, and therefore a lab could be accredited for RSS-102 only. With respect to RSS-102, ISED is proposing to allow labs to be accredited in three separate areas:

² The proposal also includes Broadcasting Equipment Technical Standards, but these are not relevant to Cisco and we do not consider them here.

³ RSS-102 governs radio frequency exposure compliance for wireless devices.

specific absorption rate (SAR), RF exposure evaluation, and nerve stimulation. Cisco agrees with ISED that designing an accreditation program that allows test labs to specialize in specific parts of the regulations and standards is a good approach. To the extent labs exercise that flexibility, it is important for the test lab to provide the list of accredited RSS specifications to the manufacturer or OEM before testing a particular product.

Questions D-1, 2. ISED proposes a six month transition period following publication of its decision in this matter to allow testing laboratories time to acquire their accreditation. ISED further proposes that labs renew their accreditation every two years. Cisco believes that six months is too short and suggests a transition time of 12 months. We believe this is more reasonable time frame to allow labs to be reviewed and accredited to the new requirements. Cisco has no objection to the renewal of accreditation once every two years.

Respectfully submitted,

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