



## A2LA Comments on SMSE-011-17

October 30, 2017

In the Matter of:

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

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**Introduction** – The American Association for Laboratory Accreditation (A2LA) is a nonprofit, non-governmental, public service, membership society. A2LA provides comprehensive services in laboratory accreditation and laboratory-related training. Services are available to any type of organization, be it private or government. A2LA’s laboratory accreditation program is based on internationally accepted criteria for competence (ISO/IEC 17025:2005). A2LA also offers programs for accreditation of inspection bodies, proficiency testing providers, reference material producers and product certification bodies.

A2LA’s mission is to provide world-class accreditation and training services for testing and calibration laboratories, inspection bodies, proficiency testing providers, reference material producers and product certifiers. These and other future services should create stakeholder confidence in the quality, competence and integrity of all A2LA-accredited organizations and in their products and services.

A2LA seeks to establish cooperative arrangements with laboratory accreditation systems in other countries and in the United States. These arrangements facilitate the acceptance of test and calibration data between A2LA-accredited laboratories and other countries/economies. A2LA is currently a full member signatory of the following International Mutual Recognition Arrangements (MRAs):

- International Laboratory Accreditation Cooperation (ILAC)
- Asia Pacific Laboratory Accreditation Cooperation (APLAC)
- Inter-American Accreditation Cooperation (IAAC)
- International Accreditation Forum (IAF)

We appreciate the opportunity to provide comments on the proposals outlined by ISED in SMSE-011-17, and are in strong support of a majority of the changes presented. In an effort to strengthen and clarify areas of concern identified by our organization, we offer the following comments, organized according to paragraph numbering within the document or according to section number within a corresponding annex:

**Comment #1: Annex A.8** specifies that the accreditation body provide evidence of its accreditation status and scope upon request by ISED. We suggest that ISED accept signatory listings on accreditation cooperation websites in lieu of a separate scope document, as these may not be provided to the accreditation body, as a part of the accreditation cooperation.

**Comments #2: Annex A.8** specifies that accreditation bodies will be recognized for a period of two years. We suggest a four year recognition period, to align with accreditation cooperations, such as ILAC.

**Comments #3: Annex B.4** specifies that a testing laboratory be accredited to the latest version of ISO/IEC 17025. As a new version of ISO/IEC 17025 is set to be released in the near future, it is likely that many testing laboratories will be accredited to ISO/IEC 17025:2005 when the new rules are released. We suggest allowing for the recognition of laboratories accredited to ISO/IEC 17025:2005 for a predefined transition period, such as three years to align with accreditation cooperations such as ILAC.

**Comment #4: Paragraph 29** specifies a 6 month transition period from the publication of the new requirements for testing laboratories to acquire their accreditation. Many testing laboratories may be prepared at the current time to apply for accreditation; however, some laboratories may not be currently operating in accordance with ISO/IEC 17025. We suggest a one year transition period to allow for laboratories to prepare for and achieve their accreditation. We agree with the proposal that testing laboratories renew their accreditation every two years.

Thank you again for the opportunity to provide comments on the proposed changes. Please feel free to contact us with any questions.

Respectfully,

A handwritten signature in black ink that reads "M. Riebau". The signature is written in a cursive, flowing style.

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