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To: Mr. Martin Proulx
Director General,
Engineering, Planning and Standards Branch
Spectrum, Information Technologies and Telecommunications Sector,
Innovation, Science and Economic Development Canada
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Via email: ic.spectrumauctions-encheresduspectre.ic@canada.ca

Subject: **ISED SMSE-011-17: Consultation on New Requirements for Wireless Device Testing Laboratories (the Consultation) - Comments**

Dear Mr. Proulx,

1. We would like to thank the Department for the opportunity to provide comments on the above-noted Consultation. The proposed changes serve to implement a number of important improvements to the conformity assessment process related to wireless equipment subject to certification (Category 1 equipment).
2. We actively participated in the development of the comments submitted by the Radio Advisory Board of Canada to the Department and we concur with the Board's submission. We are also pleased to provide the following additional comments for the Department's consideration. Our additional comments use the same section headings as in the Consultation.
A. 1. Proposed procedure to recognize accreditation bodies in non-MRA countries (annex A)
3. As noted in the Consultation, there are numerous testing laboratories for wireless products located in non-Mutual Recognition/Agreement/Arrangements (MRAs) and we generally agree with the Department's proposal to recognize bodies that are able to accredit such facilities.
4. We believe that the implementation of an accreditation process to ensure that laboratories can continue to perform testing to ensure compliance with ISED's technical standards for wireless products is consistent with the generally accepted processes that are used both domestically and in MRA countries.
5. With respect to *Annex A – Procedure for the recognition of accreditation bodies for non-MRA countries*, we note that, in Section 8 – *Retaining recognition*, the Accreditation Bodies (ABs) will be recognized for a period of two years after which time renewal of the recognition

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should be sought. This renewal could be considered optional given the use of the word "should". We are of the view that the renewal should be made mandatory and propose replacing the phrase "should be sought" with "must be obtained".

6. With respect to Section 9 – *Suspension or withdrawal of recognition*, we understand from previous discussions with the Department that testing laboratories will continue to be recognized if they were accredited before the date that AB recognition was withdrawn. Given that the proposed two-year renewal cycle for ABs and their approved laboratories are not necessarily aligned, it is possible that ABs will have lapsed in their own conformance to ISO 17011 or their ability to accredit to ISO 17025 before the problem is identified through renewal or other means. We therefore recommend that, in the case where an AB has its recognition revoked, ISED should review all laboratories which have been accredited by that AB since the AB's last successful renewal or audit to ensure their accreditation remains valid. Such laboratories should, however, remain recognized during this review process.

B.1. Proposed procedure for recognition of testing laboratories (annex B)

7. We agree with the Department's proposal to further strengthen its conformity assessment scheme related to certification by requiring testing laboratories to be accredited to the latest ISO/IEC 17025 standard by a body that is recognized by ISED to perform such accreditation. In our view, implementation of such an approach in non-MRA countries is consistent with the approach used domestically and in MRA countries. Further, the proposed approach would serve to tighten the recognition criteria for testing laboratories.

8. Consistent with our comments under Proposal A.1 above, to avoid issues with laboratories that may have been accredited by an AB during a period under which the AB was non-conformant, we recommend that ISED review all laboratories that have been accredited by such an AB since their last successful renewal or audit to ensure their accreditation remains valid.

D.1. Proposed transition period of six (6) months following the publication of the decision and relevant procedures

9. We agree with the Department's proposal to allow a six month transition period following the publication of a decision and relevant procedures related to this Consultation to ensure that testing laboratories have sufficient time to obtain their accreditation.

D.2. Proposed accreditation renewal period every two (2) years for testing laboratories

10. We support the Department's proposal that each testing laboratory must renew their accreditation every two years. Two years is a reasonable period that balances the cost and administrative burden of obtaining/reviewing renewals and the need for maintaining up-to-date accreditation.

11. Should you have any questions please do not hesitate to contact me.

Yours truly,

[Original signed by M. MacInnis]

Michael MacInnis

Vice President - Regulatory Affairs

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