

Dear Sir,

We refer to the document "Consultation on New Requirements for Wireless Device Testing Laboratories" issued by the Department of Innovation, Science and Economic Development Canada (ISED).

As a Designating Authority under the APEC Tel MRA, OFCA notes that there is virtually no change in the recognition of foreign test labs in APEC economies. We are pleased to continue to designate test labs seeking recognition by ISED in accordance with the requirements set out in Section 5, Annex B of the consultation document SMSE-011-17. We also appreciate the proposed splitting of scopes of RF exposure testing to allow testing labs to focus on their areas of expertise.

In our role as a telecommunications regulator, we would like to commend ISED for opening equipment testing services to non-MRA countries. More importantly, this will enhance competition in the provision of equipment testing services which in turn offers better service quality to the testing and certification industry. Similar to the ISED's initiative under consultation, locally, we have put in place the "Recognized Testing/Certification Agencies (RTAs)" scheme under which we recognise test labs from any countries to perform equipment testing against our prescribed technical standards. To be recognised by OFCA, these labs must have obtained ISO/IEC 17025 accreditation covering the relevant technical standards or equivalent standards. The information can be found in OFCA's website at:

<http://www.ofca.gov.hk/filemanager/ofca/common/Industry/telecom/standard/i411e.pdf>

In an era of global trade, geographical locations and the lack of MRA between countries should no hinder competent test labs in providing good quality services to the industry. Instead, test labs should be recognised on account of their technical capability.

Thanks.

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