

From: Alexandra.Aronin@economy.gov.il [mailto:Alexandra.Aronin@economy.gov.il]
Sent: October-03-17 6:20 AM
To: ConsultationRadioStandards-ConsultationNormesRadio (IC)
Cc: Losier, Yan (IC); Yaacov.Wachtel@economy.gov.il; Rachel.Hirshler@Economy.gov.il;
Debbie.Milstein@economy.gov.il
Subject: FW: CANADA: Consultation on New requirements for Wireless Device Testing Laboratories

Hello,

We would like to note that the Israel-Canada MRA allows Israel's testing laboratories to be accredited by the US accreditation body A2LA. In Annex II to Phase I and Phase II Procedures (List of Designating Authorities, Regulatory Authorities and Accreditation Bodies for Canada and the State of Israel), in the case of Israel the list of accreditation bodies is as follows:

Accreditation Bodies:

Israel Laboratory Accreditation Body (Phase I only)
HaKineret St.
P.O. Box 89,
Lod Airport
70150
Israel
<http://www.israc.gov.il>

A2LA (Phase I and II)
5301 Buckeystown Pike,
Suite 350,
Frederick, MD,
United States
21704-8373
<http://a2la.org>

This makes it possible for Israel laboratories to choose an accreditation body on the one hand, while on the other hand enabling an Israel designating authority to designate this testing laboratory in the framework of the MRA.

However, a new draft requirement for wireless device testing laboratories, states as follows in Annex B - Procedure for the recognition of foreign testing laboratories:

4. *Criteria for recognition*

In order to be recognized by ISED all testing laboratories subject to Declaration of Conformity (DoC) or Certification must:

- a. *be accredited to latest ISO/IEC 17025, **General Requirements for the Competence of Calibration and Testing Laboratories** by an accreditation body located in an MRA country or by a recognized accreditation body for non-MRA countries listed on the ISED's website*

Obviously, this requirement limits testing laboratories which are seeking accreditation by US and Canada accreditation bodies. Therefore, we propose to include into the requirements the list of accreditation bodies appointed by Canada itself for MRA phases I and II:

For Phase I : A2LA; ANAB; L-A-B; NVLAP
For Phase II : A2LA ; ANSI

Our proposal for the amended requirements is as follows:

- a. be accredited to latest ISO/IEC 17025, [General Requirements for the Competence of Calibration and Testing Laboratories](#) by an accreditation body located in an MRA country, [or by accreditation bodies appointed by Canada for MRA](#), or by a recognized accreditation body for non-MRA countries listed on the ISED's website

Sincerely,

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