PCTEST Lab Comments for

Canada Gazette, Part 1, August 31, 2017
Consultation on New Requirements for Wireless Device Testing Laboratories
SMSE-011-17

Section	PCTEST Comment
9. 29. "ISED proposes that each test laboratory renew their accreditation every two (2) years."	We believe that new technical requirements are updated very frequently, at least two times a year, and accreditation every 2 years is too long a time to ensure confidence in a test laboratory. Given the industry, most staff in test laboratories turn over in less than 2 years. We believe that employees of test laboratories are best monitored in an annual period. We therefore recommend every 1 year for test laboratories to renew accreditation, and extend to 2 perhaps with some degree of confidence after year 1.
9. 29.	We believe that changes in key personnel should trigger some level of re-assessment. Perhaps full assessment is not needed, but at least demonstration of continuity of technical oversight of the lab from one person to another should be required at minimum.
Annex A. 9. 3. Accreditation body recognition procedure for non-MRA countries: Technical Qualifications	We believe that key personnel must be declared or documented with ISED who is the responsible person performing the QC for the test laboratory. Documentation of their competence will help test laboratories be mindful about continuity of technical oversight of compliance data from year to year. ISED should monitor frequent change in staff and perhaps obtain a list of authorized test staff and years of experience to provide sufficient confidence of the laboratory operation. This can be cross-checked with Annex B. 9 if necessary.
Annex C. I. Scope of Assessment Or Annex C VI. SAR Personnel	Recommend to add: **"Does the test laboratory demonstrate ability to make a determination of overall compliance given standalone and simultaneous SAR capabilities with the ISED DRS Notices, Supplementary Procedures (SPRs), and accepted FCC KDB procedures?"** >> Reason for this, is because many labs can test standalone SAR, but many foreign labs fail to integrate the data coherently or correctly to make a determination of compliance, especially concerning simultaneous SAR assessments.
Annex C IV. Nerve Stimulation	Recommend to separate Nerve Stimulation from RF Exposure, since the scope is distinct
Annex C IV. Nerve Stimulation Or Annex C VI. Nerve Stimulation	Recommend to add: **"Does the test laboratory demonstrate ability to differentiate instantaneous measurements from average measurements of the measurements through the measurement protocols adopted?"** >> Reason for this, is that many will apply MPE measurements and

Personnel	not “max hold” to capture instantaneous impulses and incorrectly concluding compliance.
Annex B, Section 9	Recommend to update the wording from “and the person(s) who performed each test.” to “the person(s) responsible for each test.” >> Reason for this, is that many devices these days support a large volume of capabilities and bands and it may not be practical to record each engineer in the test reports. A responsible person or persons may be more appropriate given modern devices, which could also be cross checked with a key personnel list.
Annex C, I. 7-8	Recommend to clarify which publication version or year of IEEE 1528 and IEC 62209 are required for accreditation, as there are multiple versions of these standards with different testing requirements.
Annex C, III. 30	Recommend to revise the wording to, “Does the laboratory have the proper equipment (TSL, dipoles, VNA for dielectric measurements, etc.) to cover the applicable frequency ranges listed in the scope of Health Canada Safety Code 6?” >> Reason for this, is that Health Canada Safety Code 6 requires SAR for a much larger frequency range than addressed by the international standards. New equipment is available to cover operations in frequency ranges required by Health Canada Safety Code 6 but not yet finalized in the international standards.
Annex C, III, 33.	Recommend to remove, as this is duplicated in the SAR Laboratory Personnel section in Section VI.
Annex A, 5. 3)	Recommend to add: “expertise and capability to accredit SAR (Specific Absorption Rate) to the latest ISO/IEC 17025, General requirements for the competence of testing and calibration laboratories.” >> Reason for this, is that assessors and accrediting bodies need to ensure the evaluation includes appropriate expertise to evaluate appropriately for SAR as it is a separate scope and there are frequent changes to SAR procedures and guidelines
Annex C	Recommend to add Laboratory Location(s) Assessed to Technical Assessment Checklist >> Reason for this, is that many laboratories have multiple locations and it should be ensured that all locations meet the technical requirements for accreditation

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