

Dear ISED representative:

With respect to C.1. I am concerned that requiring full scope of accreditation for a standard may place an undue burden on test laboratories, where a partial scope would fully cover the testing being performed.

I am proposing that waivers be allowed by the CB/CAB to accept testing performed under a partial scope of accreditation, provided that all testing is done so under scope of accreditation. For example if a Lab is accredited to RSS-247 Non-DFS, and performs testing on a Non-DFS device, that the CB/CAB will be able to accept such data despite the lab not having a full scope of accreditation to RSS-247. Or if a Lab is accredited to RSS-247 Non-DFS and performs testing on a DFS device for all the non-DFS requirements of RSS-247, and then all the DFS only testing is performed at an alternative accredited lab, then all such testing is performed under scope of accreditation and should be acceptable.

This can be worded in the standard "Waivers for testing where the test laboratories scope of accreditation covers the testing portion performed, but the scope of accreditation does not fully cover the complete standard can be addressed to ..."

Additionally, given specific example above I additionally request RSS-247 be split into two RSS-247 (Including DFS requirements) and RSS-247 (Excluding DFS requirements).