

ZTE Corporation Comments on

“Consultation on New Requirements for Wireless Device Testing Laboratories  
SMSE-011-17”

December 12, 2017

ZTE Corporation is a global leader in telecommunications and information technology. The company is committed to providing integrated end-to-end innovations to deliver excellence and value to consumers, carriers, businesses and public sector customers around the world to enable increased connectivity and productivity.

Our laboratories are currently accredited for testing EMC and wireless devices in China by CNAS (China national accreditation service for conformity assessment). But China is the non-MRA country with Canada.

The 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**

It means if our lab wants to be accredited testing laboratory by ISED, CNAS must be first a recognized accreditation body listed on the ISED’s website. Or we must be accredited by another accreditation body located in an MRA country. We have concern that whatever both two will be finished for long time. It will effect on the application for our test lab recognition and increase the certification or testing costs for our products.

**D. ISED seeks comments on:**

- 1. Proposed transition period of six (6) months following the publication of the decision and relevant procedures**
- 2. Proposed accreditation renewal period every two (2) years for testing laboratories**

So we propose the transition period should be a minimum of 2 years instead of six month on the draft requirement. We will have enough time to get the accreditation.

Thank you again for the opportunity to provide comments on the proposed changes. Please feel free to contact us with any questions.

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