

To: Mr. Martin Proulx
Director General
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Submitted by email at:

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Subject: SMSE-011-17 — Consultation on New Requirements for Wireless Device Testing Laboratories

LGAI Technological Center S.A., known as Applus+ Laboratories from now on in this document, Applus+ has a Global network of multidisciplinary testing laboratories focused on the development, validation, quality control and product certification. Applus+ have the latest generation laboratories of Electrical and Electronics, EMC and RF that allow us to test and validate from components to large-scale products, such as complete vehicles. We have a long accumulated testing experience for a wide variety of industries such as automotive, consumer electronics, information technology, aerospace, rail, defence or energy.

Applus+ appreciate the fact of letting interested parties with the opportunity to reply to the received opinions from other Organizations taking into account its comments and feedback regarding the SMSE-011-17 once the period of submitting initial comments is closed.

Comment #1, Paragraph 29: Applus+ do agree with the major of comments received regarding this paragraph [*references from A2LA, Cisco Systems Inc., ENAC, etc.*] that we consider short the proposed transition period of 6 month due to the several stated premises. A 12 month transition period may seem reasonable in order to let all interested parties to fulfill new requirements.

Comment #2, Paragraph 24: Applus+ strongly supports the fact of letting the Laboratory to choose its field of expertise by means of providing a granular scope of accreditation based on their area of expertise [*references from Anonymous, Cisco Systems Inc.*].

Comment #3, Annex C: Applus+ not fully agrees with the received comments regarding the checklist in Annex C. We consider this Annex redundant since all of the points addressed are covered by an accreditation under ISO 17025. In addition, in a more practically way, due to the granularity of a laboratory to choose its Accreditation Scope if a given Laboratory choose not to be Accredited versus RSS 102, then almost half of the checklist becomes not applicable. Applus+ considers Annex C redundant and inessential.

We are looking forward to provide additional support to ISED if further information is required.

Respectfully,

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