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Re: ISED seeks comments on SMSE-011-17 Consultation on New Requirements for Wireless Device Testing Laboratories

Dear Sir/Madam,

In SMSE-011-17 posted on August 31, 2017, Innovation, Science and Economic Development Canada (ISED) is seeking comments on conformity assessment on the testing laboratories located in non-MRA countries, with the proposed changes on the scope and categories, transition and renewal period.

Lenovo studied the details of the proposals from ISED. Lenovo:

- Strongly supported ISED's proposal to allow accreditation bodies to be recognized by ISED and perform accreditation to testing laboratories located in non-MRA countries;
- Supported the ISED's suggestion on splitting the accreditation to RSS-102 in categories based on their specific area of expertise.

Nevertheless, **Lenovo China** expressed its concern on [9. Proposed transition period and renewal period for accreditation of testing laboratories](#) for the proposing transition period of six(6) months. It would not be a suitable length, taking account of the points as below:

- 1.) There'll be some discussion points arisen when implementing the accreditation by Accreditation body (AB) in Non-MRA locations. Six(6) months would be not enough to clear away all the arguments not known now.
- 2.) The reference standards and specifications, such as OATS, have experienced some changes after they were originally referred in [RSS-Gen — General Requirements for Compliance of Radio Apparatus](#). The laboratories should digest the changes and achieve agreement with the AB. The time laps in sequential would require more transition period than six(6) months.

So, we sincerely suggest that a longer period as twelve(12) months would be more graceful for transition period following the publication.

Respectfully submitted,

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