

November 7, 2017

Mr. Martin Proulx
Director General
Engineering, Planning and Standards Branch
Spectrum, Information Technologies and Telecommunications Sector,
Innovation, Science and Economic Development Canada
235 Queen Street, 6th Floor
Ottawa, ON, K1A 0H5

Submitted by email: ic.consultationradiostandards-consultationnormesradio.ic@canada.ca

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

The Board is pleased to respond to the above noted consultation. The response was developed by members of the RABC EMC Committee with participation from invited guests, under the leadership of the Chair of the EMC Committee. The consultation had narrow interest amongst RABC members, with the invited guests outnumbering RABC members.

The RABC is in general agreement with the proposed changes to the conformity assessment process related to wireless equipment subject to certification. Participants in the review did express some concern regarding the proposed transition period. The Board suggests the following improvements.

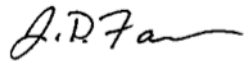
First, the transition period should be a minimum of 1-year and, preferably, a minimum of 2-years. It is understood that it could take much longer than six months for an accreditation body to submit an application to ISED and it would take a number of months for the accreditation body to conduct an audit of the laboratory.

Second, the transition period should have an additional timeframe for the acceptance of data from previously recognized laboratories (those labs recognized by the current framework) and which are unable to meet the ISO 17025 requirement. The Board foresees potential problems related to data submitted following the implementation of the new conformity process from previously recognized laboratories that may have undertaken measurements just prior to the regime change. It is therefore recommended that in cases where a laboratory is unable to meet the new ISO 17025 requirement within the allocated time of 1 or 2 years, an additional 3-month grace period will apply to complete the projects that are under way.

This response was sent to RABC Sponsor Members for ballot. Ten of the RABC's twenty-one Sponsor Members responded as follows: 6 approved (APCO, CanWISP, Department of Defence, MAAC, RCMP and UTCC); and 4 abstained (CAB, CBC/Radio Canada, CECA and NavCanada).

The Board appreciates the opportunity to respond to this consultation.

Sincerely,

A handwritten signature in black ink, appearing to read "J. D. Farnes", with a stylized flourish at the end.

J. David Farnes
General Manager