# NIST TEL MRA Program – Supplemental Instructions

Test Lab Scope of Accreditation to Support ISED Recognition

&

ISED Test Lab Technical Assessment Checklist (2021 version)

March 31, 2024 (V2)

### Key Resources

Application Instructions from NIST <u>NIST Designation Requirements for Canada</u> ISED Requirements ISED <u>REC-LAB</u> ISED Standards – <u>Annex I</u> ISED <u>Radio Standards Specifications</u> ISED <u>Broadcasting Standards</u> ISED <u>Terminal Equipment Standards</u> ISED Recognized CABs <u>Wireless Device Labs</u> <u>Terminal Attachment Labs</u>

**Certification Bodies** 

#### Applying (New, Renewal, Extension, or Scope Expansion)

Instructions for applying for recognition are posted at the <u>NIST Designation Requirements for Canada</u> webpage.

Please refer to the appropriate sections of the website under these section titles:

Initial Application Documents & Process Renewing ISED Lab Recognition (*with Accreditation Renewal*) Extending ISED Lab Recognition (*with Accreditation Extension*) Expanding ISED Lab Recognition (*via Interim Assessment*)

Send application information to NIST (mra@nist.gov)

# Test Lab Scope of Accreditation to Support ISED Test Lab Recognition

- **RSS/BETS:** When applying for recognition select one of the following options:
  - Option 1: Include the **RSS/BETS number, issue number, issue date, and latest update/amendment number and date** on the Scope of Accreditation.
  - Option 2: Include a list issued by the AB (as approved by ISED) of the specific RSS and BETS that were assessed in the most recent assessment. The list shall include the **RSS/BETS number, issue number, issue date, and latest update/amendment number** and date. If this option is selected, the ISED checklist does not need to list the standards assessed.

(Note: At the time of the assessment, the lab must be assessed to most recent version of each RSS/BETS standard (within the ISED specified transition period).

- CS-03 Parts (except Parts III and IV which are not available):
  - Include the following for all the CS-03 Parts on the Scope of Accreditation:
    Part #, Issue #, Amendment #, year
  - **RSS-Gen** must be included on the Scope of Accreditation (for the main location and any satellite labs as applicable) if seeking recognition for any RSS standards at the location. This does not apply if the designation request is limited to RSS 102 sub-scopes.
  - **RSS-247**: If your laboratory does not have the capability to test for DFS, you have the option of getting recognized for RSS-247 (no DFS). The Scope of Accreditation must note the exclusion.

RSS-102, Issue 5 (Valid to 12/15/2024)

- Labs seeking recognition for any part of RSS-102 (Issue 5) must be accredited for one or more of the relevant sub-scopes as note below:
  - RSS-102 Measurement (<u>SAR Specific Absorption Rate</u>)
  - RSS-102 Measurement (<u>RF Exp. RF Exposure Evaluation</u>)
  - RSS-102 Measurement (<u>NS Nerve Stimulation</u>)
  - RSS-102 Measurement (LPD Localized Power Density)
  - RSS-102 Computational (LPD)
  - RSS-102 Computational (SAR)
  - RSS-102 Computational (NS)
  - RSS-102 Computational (RF Exp.) Not Available

Notes for RSS-102, Issue 5 Scopes of Recognition (valid to 12/15/2024)

- If the lab is only doing RF Exp. power density calculations, the lab should be accredited for RSS-102 Measurement (RF Exp.). For further information, see NIST guidance for Question 30a - page 6 below.
- For RSS-102, Section 2.5 and Annex C there is no ISED designation available or required. Since there is no evaluation done by the testing laboratory, there is no need to have RSS-102 recognized by ISED. The lab can still submit the Annex C to the ISED Certification Engineering Bureau (CEB). CEB will accept Annex C when no evaluation is required for SAR, NS or RF Exposure.
- Accreditation, designation, and recognition for RSS-102 Computational (RF Exp.) is not available as the requirements for the computational algorithms are not yet fully defined.
- For labs that obtain ISED recognition for computational scopes, please note that ISED is displaying the superscript **SIM** (for simulation) instead of **COMP** on their website. We confirm that SIM = COMP.

# RSS-102, Issue 6 (Valid as of 12/15/2023)

ISED published its <u>new series of RSS-102 standards</u> on December 15, 2023.

The publications became effective immediately and include a one-year transition period.

 Current RSS-102, Issue 5 Scopes of Recognition remain valid until the end of the transition period (December 15, 2024).

The revised series of standards reflects new nomenclature.

- CABs must update the ISO/IEC 17025 Scope of Accreditation and "upgrade" their associated ISED Scopes of Recognition to reflect the new standards.
  - CABs can begin to upgrade their existing Scopes of Recognition now.
    - It is our current understanding that this upgrade process must be completed by December 15, 2024. This is the end of the transition period.

- ISED has provided the table below.

- The table illustrates the Scopes of Recognition under RSS-102, Issue 5 and how these Scopes correlate to the upgraded Scopes of Recognition (including new nomenclature) under RSS-102, Issue 6.
- The table reflects how the Scopes of Recognition under the two RSS-102 issues (5 & 6) are/will be displayed on the ISED <u>Wireless Device Testing Laboratory</u> webpage.

Issue 5 (Current)	AB Action for Upgrade	Issue 6 (Upgrade)	
Measurement:			
RSS-102(SAR) <sup>MEAS</sup>	Document review or remote assessment	RSS-102*, RSS-102.SAR.MEAS	
RSS-102(NS) MEAS	Document review or remote assessment	RSS-102*, RSS-102.NS.MEAS	
RSS-102(LPD) <sup>MEAS</sup>	Currently not available for recognition	RSS-102*, RSS-102.APD.MEAS***	
	Document review or remote assessment	RSS-102*, RSS-102.IPD.MEAS	
RSS-102(RF Exp.) <sup>MEAS**</sup>	NA	NA	
Computational/Simulation			
RSS-102(SAR) <sup>sim</sup>	Document review or remote assessment	RSS-102*, RSS-102.SAR.SIM	
RSS-102(NS) <sup>SIM</sup>	Document review or remote assessment	RSS-102*, RSS-102.NS.SIM	
RSS-102(LPD) <sup>SIM</sup>	Currently not available for recognition	RSS-102*, RSS-102.APD.SIM***	
	Document review or remote assessment	RSS-102*, RSS-102.IPD.SIM	
*RSS-102 which is a general document shall be included on the scope of recognition in all cases with the corresponding RSS-102 standard (SAR, NS, APD and/or IPD)			
**RSS-102(RF Exp.) <sup>MEAS</sup> recognition will no longer be required <u>after the transition period of REC-LAB issue 6 closes</u> .			

\*RSS-102.APD.MEAS/SIM are currently not available for recognition

 As noted in the table, the AB document review or AB remote assessment is an acceptable process for revising the ISO/IEC 17025 Scope of Accreditation for this effort, pending the applicability of any additional AB policies.

 Once the ISO/IEC 17025 Scope of Accreditation has been revised to reflect the new standards/nomenclature, please send it to NIST along with a request for NIST to process the ISED Scope of Recognition "upgrade" with ISED.

- For this "upgrade" request, the requested changes must be limited only to the upgrade of the RSS-102 Issue 6 Scopes of Recognition from the current RSS-102 Issue 5 Scopes of Recognition (see ISED table).
  - If there are other ISED standards changes on the ISO/IEC 17025 Scope of Accreditation, or if the CAB is requesting the upgrade in conjunction with a renewal, for example, the additional (normal) ISED designation documentation requirements apply.
- **RSS-310** is not available for recognition since this standard is for equipment exempt from ISED certification.
- Partial RSS or BETS standards: Labs seeking recognition for only part of a standard (due to a limited accreditation) that is not already subdivided as show above must first obtain approval from the limited standard from ISED. Labs should use the ISED <u>General Inquiry Form</u>. ISED's response (stating whether the new subdivided standard can be designated to ISED) must be submitted to NIST along with the request for designation.
- **Satellite Locations:** In additional to obtaining recognition for the main lab location, recognition is also required for any additional testing locations included in a Scope of Accreditation (as satellite facilities) <u>if regulatory testing will occur at that location</u>. Each location (main and any satellites) will be recognized for a specific scope of recognition in accordance with the standards covered under the ISO/IEC 17025 accreditation (for that location). ISED will only accept testing conducted at locations that are recognized by ISED.
  - The address of each satellite facility that is covered must be identified on the ISED Technical Checklist, and the ISO/IEC 17025 Scope of Accreditation must identify the specific test methods covered at that location (or the AB must provide this information in a letter or form).
  - If any RSS standards (other than RSS-102 sub-scopes) are included in the scope of designation for the satellite location, the satellite location must also be accredited for RSS-GEN.

# ISED Technical Checklist (October 2021 version)<sup>1</sup>

During the CAB's assessment, the accreditation body's assessor(s) must complete the <u>ISED Testing</u> <u>Laboratory Technical Assessment Checklist</u> (Technical Assessment Checklist).

The Technical Assessment Checklist must be submitted with the application for designation and include the following:

General Information section fully completed. The AB must either (a) include the list of standards assessed on the Checklist, or (b) provide a separate form listing each standard that was assessed. If the AB provides the separate form, the list of standards assessed do not need to be duplicated on the Checklist. The AB form of standards assessed must then be provided to NIST (for ISED).

NIST can only designate for standards that are included both on the Checklist/AB Form <u>and</u> on the Scope of Accreditation.

- For any nonconformities cited, the AB must include a notation on the Checklist confirming that the nonconformity has been closed.

Before Applying for NIST Designation, please review your ISED Technical Checklist to be sure the answers included by the assessor correctly reflect the scope of recognition you are seeking, and that the information matches the Scope of Accreditation content. The ISED Technical Checklist information (answers and comments) MUST match your request <u>and</u> the Scope of Accreditation information.

<sup>&</sup>lt;sup>1</sup> ISED is developing a revised Checklist. Publication of the revised Checklist is expected in mid-2024.

# Specific Technical Checklist Questions (October 2021 Version)<sup>2</sup>

- Questions for all RSS-102, Issue 5 sub-scopes currently available: Certain questions on the ISED Technical Checklist must be noted as YES by the assessor. See the table below.

Scope of Accreditation	Question #s on the ISED Technical Checklist that must be noted as <b>YES</b>
General Questions	1, 3, 4, 5, 6, 7, 14, 34, 35, 36, 37, 38, 39, 42, 43
Applies to all ISED scopes below	
RSS-102 Measurement (SAR)	General Questions (above) & 2f, 25a, 26, 27, 28, 46, 47, 48
RSS-102 Measurement (RF Exposure)	General Questions (above) & 30a, 31
	If lab is performing power density <b>calculations only</b> – the assessor should note "calculations only" in the Q30a comment field.
	If lab has <b>limited frequency range</b> for power density <b>measurements</b> , the assessor should note the range in the Q30a comment field.
	See further guidance for Q30a on page 6 of this document.
RSS-102 Measurement (NS)	General Questions (above) & 32, 33
RSS-102 Measurement (LPD)	General Questions (above) & 2f, 8, 13 <sup>*</sup> , 25a, 26, 27, 28, 29, 46, 47, 48
	*Q13 (test site validation for radiated emissions testing) does not apply if the CAB is only seeking recognition for RSS-102, Issue 5 Scopes of Recognition.
RSS-102 Computational (LPD)	General Questions (above) & 25b, 27, 28, 29
RSS-102 Computational (SAR)	General Questions (above) & 25b, 28
RSS-102 Computational (NS)	General Questions (above) & 30b, 33
RSS-102 Computational (RF Exp) NOT AVAILABLE	General Questions (above) & 30b, 31

Note: For RSS-102, Issue 5, Section 2.5 and Annex C – there is no ISED designation available or required. Since there is no evaluation done by the testing laboratory, there is no need to have

<sup>&</sup>lt;sup>2</sup> <sup>2</sup> ISED is developing a revised Checklist. Publication of the revised Checklist is expected in mid-2024.

RSS-102 recognized by ISED. The lab can still submit the Annex C to the ISED Certification Engineering Bureau (CEB). CEB will accept Annex C when no evaluation is required for SAR, NS or RF Exposure.

- **Question 2c** (re: ANSI C63.10-2013, American National Standard for Testing Unlicensed Wireless Devices) must be "Y" for seeking recognition for any of the RSS standards in the RSS-2XX series.
- **Question 2d** (re: ANSI C63.26-2015, Standard for Compliance Testing of Transmitters Used in Licensed Radio Services) must be a "Y" if seeking recognition for any of the RSS standards in the RSS-1XX series (except RSS-102).
- Question 2e (re: ANSI C63.17-2013, American National Standard Methods of Measurement of the Electromagnetic and Operational Compatibility of Unlicensed Personal Communications Services (UPCS) Devices) must be a "Y" if seeking recognition for RSS-213.
- Question 7 (re: Are all measurement software packages use by the testing laboratory.... documented in the test report?) applies to the ISED requirement for listing the software in the test report. Guidance from Canada' Engineering Bureau (CEB) has indicated that labs must use something in terms of performing calculations, at the very least Excel software. Unless there is a deficiency, the answer should always be "Y". Please see RSS-Gen, Annex A – Test Report Contents (#12 and #14 b/c).
- Question 30a In the case where the lab is doing the power density calculations for Annex A but not doing any power density measurements, Q30a must be answered "Y" and the assessor must add the comment "Calculations only". It is <u>not necessary</u> to list "calculations only "on the Scope of Accreditation (unless it is the AB's policy). The ISED recognition will be for RSS 102 Measurement (RF Exp.).

### ISED Recognized CBs - Test Lab Requirements

ISED's <u>REC-CB</u> contains the requirements and procedures for ISED recognition of Certification Bodies.

- ISED requires that the Scope of Accreditation of the CB's in-house testing laboratory and that of any other contracted testing labs (located in Canada, or an economy with which <u>Canada has an</u> <u>MRA</u>) must cover <u>all RSSs and/or all BETSs in the entire CB scope recognized by ISED (except as</u> noted below for some RSS-102 sub-scopes). Copies of the contractual arrangements with other testing labs along with their ISO/IEC 17025 Scope/Certificate must be provided to NIST (for ISED). (Reference: REC-CB, Section 4.3.a.ii)
- For RSS-102, Issue 5 between the Scope of Accreditation of the in-house testing laboratory and the Scope of Accreditation of any contracted testing labs, all three sections of RSS-102 Measurement (RF Exp., SAR, NS) must be present if the CB intends to maintain ISED CB recognition for any ISED CB Scope that includes RSS-102 (Scopes 1 – 5).

Note: This does not apply for RSS-102 Measurement (LPD) and RSS-102 Computational (LPD). CBs only need to ensure covered for this scope if they are reviewing products for these requirements. ISED is transitioning to new Scopes of Recognition for RSS-102 (Issue 6). See above.

### New ISED CB Scope for Simulation

ISED plans to add a new CB Radio Scope for Simulation. This is not available yet.

# CB Acceptance of Test Reports – Timing

An ISED recognized CB can accept a test report that was generated by a lab before it had obtained ISED recognition only if (1) the lab obtained ISED recognition by the time the test report was submitted to the CB, and (2) the test report **was issued less than 12 months before.** See <u>RSS-GEN (6.3)</u>.

Prepared by R. Saar (03/31/2024)

For further information, please contact mra@nist.gov.

# Document Control

V1 - 4/1/2022 - The first version of the NIST Supplemental Instructions for the **2021** ISED Technical Assessment Checklist replaced the NIST Supplemental Instructions (V3 - 12/2019) that addressed the previous 2019 ISED Technical Assessment Checklist.

V1.1 - 10/13/2022 - The second version of this document contains updated information about the availability of the RSS-102 computational scopes for NS and SAR based on the publication of SPR-002 (2<sup>nd</sup> edition, October 2022). These two additional computational sub- scopes are now available without the need to check in with ISED first.

V2 – 03/31/2024 – This version of the document clarifies (1) the recognition requirements for satellite locations on an ISO/IEC 17025 Scope of Accreditation, (2) the ISED Checklist Question 13 for RSS-102 Measurement LPD, and (3) the options for AB confirmation of standards assessed (either via Checklist or AB form/letter). This next version also (4) incorporates the initial information on the new Scopes of Recognition under RSS-102, Issue 6, which was published 12/15/2023, and provides guidance on how labs can "upgrade" their RSS-102 Issue 5 Scopes of Recognition to the RSS-102 Issue 6 Scopes of Recognition. Several additional minor edits and updates have been made.