

#### Clause 6. Scope of Accreditation.

Whilst one assumes that the required scope, table 1, will evolve over time. E.g. it is expected that the ANSI/TIA-603-D document will be replaced with more technology relevant standards such as ANSI C63.26, the inclusion of KDB publications on this list, which are by the FCC's admission updated more quickly adds unnecessary complications to the program.

Accreditation Bodies require a clear determination of the exact standard and version which a laboratory is seeking accreditation for, whereas e.g. the reference to KDB 789033 in table 1 links to a KDB Q&A with 3 attachments: D01, D02 & D03. All of which could be updated over time. In full, this is too unwieldy to add to a schedule of accreditation and yet the shorthand (KDB 789033) is not specific enough.

Accredited Testing Laboratories need to state in their test reports the method used, which will necessarily include reference to the latest KDB. However, if accreditation to the KDB is expected then the laboratory will require disclaimers prior to having the exact KDB assessed by their Accreditation Body. Consequently, the ability of the testing laboratory is brought into question, which is entirely counterproductive, when the original aim of accreditation is to give confidence.

The program already requires that the Accreditation Bodies check the Testing Laboratory has access to and a working knowledge of the KDB system. The TCBs already check that the Testing Laboratories report their usage of the correct and up to date KDB publications. There is also much guidance in the KDB system, which cannot be distilled into a single referenced publication.

#### Clause 11. Transition Periods.

If KDBs are to be included on the scope of accreditation, then they too will require transition periods to allow time for an Accredited Testing Laboratory to update their ISO/IEC 17025 scope of accreditation. This nullifies the benefit of the KDB system, which allows interpretations and guidance to be issued in a timely fashion and adopted with immediate effect.