



February 2010

RF/EMC Regulatory Update

International Issue

Dear Colleague,

We have provided typical questions and answers that represent in most cases technical opinions with justification in international regulatory requirements. The particulars of the product for certification must be considered with respect to the applicability of these questions and answers. We hope you find our update valuable and welcome your feedback if you have any special needs or questions. Call us at 703-689-0368 for your product testing & certification requirements. You can view archived issues of MultiPoint at our [web site](#).

NOTE: We hope you enjoy reading our second monthly MultiPoint newsletter publication featuring Q/A on international regulatory requirements and developments.

Brazil: 802.11 b/g Product Testing

QUESTION: Our firm manufactures a WLAN product and we would like to sell this product in Brazil. We understand testing must be performed in Brazil and we have the following questions:

1. How many samples should we plan to send to Brazil for testing?
2. What is the approximate time frame from the start of testing to approval?
3. What tests are required for this product?
4. Are there any additional requirements or concerns we should be aware of?

ANSWER: In response to your questions, please see below:

1. The answer is usually 2 samples. Much depends on the type of test required. Typically, for this type of product, the lab will require one sample to be configured for conducted testing (wires soldered to the antenna with the leads sticking out of the product) and one with no alterations for radiated testing.
2. The timeframe is usually 8 weeks from the time the samples arrive at the test lab. Much of this depends on the type of testing required but testing usually lasts 1-2 weeks. Then, it takes 1-2 weeks for the application to be assembled by the OCD and ANATEL 4 weeks to review the application and approve the product.
3. We believe testing will include parts of Resolution 442(EMC), 529(Safety), 506 and possibly the new 533 (SAR).
4. Your product will most likely be considered a Category 1 or 2 product and this requires the user manual to be translated into Portuguese. Additionally, an in-country legal entity will need to be the certificate holder.

UAE: 900 MHz and 2.4 GHz Bands

QUESTION: My company markets a line of 902-928 MHz and 2.4 GHz transceivers. We are interested in selling this product to United Arab Emirates. Can you provide insight on whether either of those bands are open in the UAE and general regulations for them?

ANSWER: Only the 2.4 GHz band is open in the UAE. The UAE's technical specification for this band is TS020 -2.4 GHz Wide Band Data Transmission Systems and Ancillary Equipment.

2.400 to 2.4835 GHz are the frequency bands allocated by UAE's Telecommunications Regulatory Authority (TRA) for use by radio equipment falling within the scope of TS020. TS020 specifies the following standards as applicable:


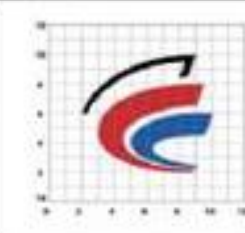
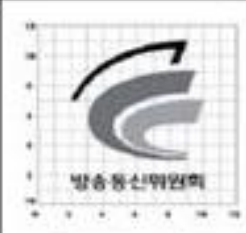

- **ETSI EN 300 328:** Electromagnetic compatibility and Radio spectrum Matters (ERM); Wideband transmission systems; Data transmission equipment operating in the 2,4 GHz ISM band and using wide band modulation techniques; Harmonized EN covering essential requirements under article 3.2 of the R&TTE Directive
- **ETSI EN 301 489-1:** Electromagnetic compatibility and Radio spectrum Matters (ERM); ElectroMagnetic Compatibility (EMC) standard for radio equipment and services; Part 1: Common technical requirements
- **ETSI EN 301 489-17:** Electromagnetic compatibility and Radio spectrum Matters (ERM); ElectroMagnetic Compatibility (EMC) standard for radio equipment and services; Part 17: Specific conditions for 2.4 GHz wideband transmission systems and 5 GHz high performance RLAN equipment

South Korea: Modular Approvals

QUESTION: Our company manufactures a wireless product that uses a radio module internally and this module already has type approval for South Korea. Can you tell me if we may sell our product in South Korea without any further testing or approvals? Also, are there any special labeling requirements?

ANSWER: Having approval of a radio module in South Korea does not allow the end product that the module is embedded in to escape the need for approval, so full approval of the end-product will be required (RF Type Registration and EMC Registration).

South Korea requires that the product include a type approval label. The label should include the KCC logo (see below), certificate holders name and code (equivalent to FCC Grantee code), equipment name (model name) and date of manufacture. Where the product is too small, it may be possible to affix the label to the packaging.

Color		Black & White	
			
Black	Pantone Black CVC/CMYK K100	Black	Pantone Black CVC/CMYK K100
Red	Pantone 485 CVC/CMYK M100 Y100 K10	Grey	Pantone D5325-3C/CMYK K70
Blue	Pantone 661 CVC/CMYK C100 M75	Bright Grey	Pantone D5325-6C/CMYK K40

Australia and New Zealand:

QUESTION: Our company is selling a product in Australia and New Zealand. We have multiple Australian and New Zealand suppliers and marking the product with each of the appropriate supplier number is becoming cumbersome. We would like to utilize the supplier number of one main supplier and mark the product with just that one number. However, we will have multiple distributors distributing the product in Australia and New Zealand. Is this acceptable?

ANSWER: Yes, it can become very cumbersome indeed. I am afraid the Australian product compliance regulations (telecom, EMC, EMR, radcom etc) place the responsibility for compliance with the importer/first supplier to the Australian market and naturally the product label must bear the Supplier Code Number (SCN) of the importer. This is the reason for the problem of course.

Very briefly, the only way your company can use the same Supplier Code Number on every device you supply is if:

- you only have a single importer and that importer then supplies multiple distributors (this option obviously presents some considerable drawbacks for many companies);
- if you still want to be able to ship directly to several companies (i.e. have several importers), one importer can act as the "Agent" in terms of compliance for all the other importers BUT each of the other importers must sign an "Agent agreement" with the importer whose number will appear on the products (this option also obviously presents some considerable drawbacks for many companies - importer acting as Agent to all other importers can control when the other importers can be shipped product as they can hold up compliance etc and most importers would not want to sign an agreement with another importer); or
- get an Australian company offering "Agent" services and work with them concerning AU/NZ compliance and use their Supplier Code Number BUT all importers must sign an Agent agreement with that company in order for your client to be able to use the Agent company's Supplier Code (the Australian regulations allow for and recognise an "agent" for an Australian importer but they do not recognize any agreement between an overseas manufacturer/supplier and a company offering Agent services). You can only label the product with the Supplier Code Number of: the importer of the device; or the importer's appointed Agent (must be appointed in writing). The beauty of this approach is that the Agent is neutral with respect to all importers. They act like the overseas manufacturer's/supplier's local representative concerning product compliance. The overseas manufacturer/supplier now only has to deal with a single organization (the Agent) instead of every importer in terms of compliance and the importers are relieved of the burden of compliance of the product also. Once the importer signs the agreement with the Agent, they do not need to do anything else. It all just happens and they get the product, with the Agent's label, once all the compliance work is done for each product.

China - SRRC and CCC Approvals

Question: Can you tell me what product types require China SRRC approval? If a product falls under SRRC's scope, is China CCC approval also required?

Answer: China's SRRC approval is compulsory for all RF transmitters such as WLAN, BT, remote control, cellphones, base stations, etc. China SRRC and CCC are two different entities. CCC has its own list of products requiring approval. A device requiring SRRC approval may also require CCC approval.

China - Customs Clearance Issues for Test Samples

QUESTION: Our company manufactures products in Europe for sale in China. Sometimes, when we ship a sample to China for SRRC approval, the sample is blocked by customs. Other times, the sample passes through customs without any issues. Can you let us know what causes this problem and how to avoid it?

ANSWER: China's customs will block those products which require CCC approval but do not have a CCC certification. If your product requires both SRRC and CCC approval and you have no CCC certificate, then the product will be blocked by China customs and require a temporary I/E procedure. A customs clearance company can be hired for assistance with the temporary I/E procedure. If your product only requires SRRC approval, then the sample may be directly shipped into China via a carrier and will not be blocked by China customs.

China - SRRC Test Samples

QUESTION: We plan to sell our WLAN product in China and we are preparing test samples for the China laboratory for SRRC approval. Do we need set the samples on continuous transmitting mode?

ANSWER: Yes, you are correct. The samples should be set on continuous transmitting mode.

China: SRRC Modular Approvals

QUESTION: Our company manufactures a radio module and we have obtained SRRC approval. Can our module be used in different hosts without additional testing and approvals?

ANSWER: SRRC requires the end product in market must be unique with the product approved. So it depends on which kind of module you approved. For example if your product is a USB connected modem, and you sell the modem in market, then this modem can be used in any hosts and not required re- approval. But another example, if you approved a BT/WiFi module which will be integrated inside a notebook, then each model notebook must be re- approved by SRRC with the RF module. The reason is because typically you will not sell the "module" in market but sell the notebook but the approved product is the module, in this case SRRC deems the "module" you approved is different stuff with "notebook" you sold. In other word the product you approved must be totally unique with the product you sold in market.

INTERNATIONAL REGULATORY UPDATES

RUSSIA: 802.11n SOON TO BE ALLOWED Regulations to permit the use of 802.11n technology in Russia are now being drafted and should be in force by May 2010.

MONTENEGRO: TEMPORARY IMPORT PROCEDURE The Ministry of Transport, Maritime Affairs and Telecommunications in Montenegro has confirmed they are now granting import permission for RF devices ahead of the new Type Approval regulations being finalized. The proposed new Type Approval regulations are still under review and are expected to be finalized in June / July 2010. In the interim period, applications will be assessed and written permission to import can be obtained.

CHINA: CCC CERTIFICATES VALID FOR 5 YEARS Effective September 1, 2009, CCC certificates are valid for five years. The original notice is available at:

<http://www.cnca.gov.cn/cnca/zwxx/ggxx/205352.s.html>.

CONTACT RHEIN TECH FOR YOUR INTERNATIONAL REGULATORY APPROVALS

Rhein Tech Laboratories' worldwide homologation services offer the best strategy for gaining product approval in a large number of target countries. In addition, we reduce the number of emissions, immunity, and product safety tests required by defining the minimum subset of regulatory standards at the onset, thus reducing the time and cost to enter multiple target countries. We offer research and approvals in over 50 countries.

ABOUT US

RTL has provided EMC compliance engineering & testing services since 1988 and has a superior reputation with both the Federal Communications Commission and others in the industry. RTL provides testing services to meet the emissions, immunity, and safety requirements of the European EMC Directive and the EU R&TTE Directive, all FCC rules and regulations, VCCI (Japan), ACMA (Australia), and other international standards.

A special thank you to those who have recommended and contributed articles for our newsletter. Please

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