

The Independent Communications Authority of South Africa (ICASA)

Attention:  
Mr Lumkile Qabaka  
E-mail: [lqabaka@icasa.org.za](mailto:lqabaka@icasa.org.za)

Date: 30 January 2019


Dear Mr. Qabaka,

**RE: A NOTICE INVITING COMMENTS ON THE DRAFT CONFORMITY ASSESSMENT FRAMEWORK FOR EQUIPMENT AUTHORIZATION**

The attached submission is made by the South African Radio Astronomy (SARA), a business unit of the National Research Foundation (NRF) established in terms of the National Research Foundation Act, Act 23 of 1998.

The submission is made in response to the invitation by the Authority to submit written representations on the draft conformity assessment framework for equipment authorization as published in the Government Gazette number 42108.

We hope that you will find our submission sound and contributing to the development of the framework.



Kind Regards,  
Mr Busang Sethole  
Spectrum & Telecoms Analyst  
[bsethole@ska.ac.za](mailto:bsethole@ska.ac.za)

Date: 30 January 2017

[www.ska.ac.za](http://www.ska.ac.za)

The South African Radio Astronomy Observatory (SARA) is a National Facility managed by the National Research Foundation and incorporates all national radio astronomy telescopes and programmes. SARA is responsible for implementing the Square kilometre Array (SKA) in South Africa.

## INTRODUCTION

The Square Kilometre Array (SKA) Project is an international effort to build the World's largest radio telescope. It is one of the largest scientific endeavours in history and it represents a huge leap forward in both engineering and research towards building and delivering a unique instrument.

The Republic of South Africa is really privileged to be one of the countries at the centre of this technological advancement and with the responsibility to host the core of the high and mid frequency dishes and ultimately extending over the African continent.

South African Radio Astronomy Observatory (SARAO) is a business unit of the National Research Foundation and it is responsible for coordinating Africa's involvement in the design and construction of the Karoo Array radio telescope and the African VLBI Network (AVN).

SARAO welcomes the opportunity to submit written representation on the draft conformity assessment framework for equipment authorization as published in the Government Gazette No. 41082. Furthermore, SARAO confirms it is not willing to participate in the public hearings process, which the Authority may undertake with respect to the draft conformity assessment framework for equipment approval.

Our submission is composed of only one part; of which we directly answer the questions relevant to SARAO as per the published document.



**Question 1 - In your view, what are the benefits of having conformity assessment to support the regulations?**

Conformity assessment provides many benefits across all aspects of the supply and demand chain of Telecommunications Terminal equipment and Radio Frequency based devices. It safeguards against the risks of malfunctioning of the equipment and enhance user safety and protection of consumer rights. It will also ensure that products commercialized or used meet the minimum quality, performance and technical requirements.

**Question 2 - Do you see any benefits in risk profiling and the categorization of equipment in carrying out the conformity assessment?**

Conformity assessment should be more dependent on the risk profile and the category of the device. For example, equipment used in radio astronomy is specialized and not intended for any other commercial use. Such equipment is normally deployed in remote and isolated areas and present very little risk to the general public or telecommunication/ RF service providers. Risk profiling and categorization can therefore be used as a way to focus and target conformity assessment (surveillance) to high risk devices.

**Question 3 - With the recommended steps for using conformity assessment in support of the regulations (figure 10), which of the steps would you say are missing in the Approval Framework, and how can they help improve the Approval Framework efficiency?**



SARAO does not often apply for equipment type approval and therefore, we are not too familiar with the approval framework challenges. We do however, like to encourage that the Authority strengthen its surveillance efforts, especially in the SKA area as there may be a number of devices that may not be allowed to operate in the declared Karoo Astronomy Advantage Areas in the future.

We would like to propose that within the steps identified in Figure 10 of the Document an approach is developed to deal with devices (especially RF devices) that will be used in the declared astronomy advantage areas.

**Question 4 - Can you suggest an appropriate conformity assessment approach that can address the current Approval Framework challenges?**

SARAO is not actively involved in the TTE/RF market and not fully aware of the current approval framework challenges. We, therefore, have no particular suggestions for preferred CA.

**Question 5 - In South African context, what are the benefits for the Authority Collaborating with other regulatory institutions/organizations/states?**

Collaboration with other institutions may strengthen the Authority's capacity through knowledge transfer and lessons from international best practices.





**Question 6 - Given table 3, which SDoC scheme/s would best suit the South African market, and why?**

SARAO proposes that the Authority implements either SDoC I or SDoC II assessment framework. In both cases, the reports will be produced by ISO/IEC 17025 accredit test facilities and that should ensure that products deployed conforms to minimum set of standards. SDoC I will benefit the authority in terms of awareness and record keeping of deployed devices. However, it may introduce an additional administrative burden to both the regulator and the applicant, an issue which may add some time delay and limit national industry competitiveness.

**Question 7 - In your definition/understanding, what ICT equipment can be classified as low risk and may be considered for equipment authorization exemption?**

SARAO appreciates that the Authority has considered the inclusion of radio telescope receivers, calibration, test equipment as well as radio telescope arrays and radio astronomy facilities. These are extremely low risk equipment, they are mostly receiving devices and normally deployed in remote areas where the EMI may hardly affect most operations. We therefore, support the inclusion of these equipment to be considered for equipment authorization exemption.



**Question 8 - What are the risks associated with exempting ICT equipment from Approval Framework, and how can they be mitigated or eliminated?**

Some of the risk associated with exempting ICT equipment include allowing equipment that do not meet the required standards to be deployed in the market. The mitigation to this risk is to use the risk profile and undertake market surveillance to suspected devices.

**Question 9 - What would you propose the Authority do to effectively execute its responsibilities on market surveillance considering the current fiscal challenges?**

No comment

**Question 10 - What are the prevalent equipment authorization challenges that may Be experienced by manufacturers, distributors, suppliers and retailers post- and pre-market surveillance?**

No comment