



SOUTH AFRICAN RADIO LEAGUE

The National Body for Amateur Radio in South Africa

A Member of the International Amateur Radio Union

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Conformity Assessment Framework for equipment authorisation

Please address communication on this topic to hans@intekom.co.za, 012 991 4662

Lumkile Qabaka

ICASA

lgabaka@icasa.org.za

29 January 2019

Dear Mr Qabaka

The South Africa Radio League has studied the draft Conformity Assessment Framework for equipment authorisation and would like to compliment ICASA on an excellent document.

We have pleasure in submitting our comments to the following questions posed as appropriate for the Amateur Service. I would also like to confirm that SARL representatives will be available for a public consultation should this be decided on.

Question 1

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

The SARL believes that there are many benefits associated with conformity assessment in specific in terms of risk assessment and the preservation of the radio spectrum against the many products that, as an unintentional consequence, radiate unwanted signals and contribute to the excessive and unwanted rise in the level of the Radio frequency noise floor.

Amateur radio does not pose a risk as radio amateurs are licenced after writing a technical examination that tests their knowledge of interference. The Amateur Radio licence conditions include provisions for immediate shut down of transmissions should interference to other services occur as a result of amateur radio transmissions.

Councillors of the South African Radio League

Nico van Rensburg, ZS6QL (President); Chris Turner ZS6GM (Vice-president); Cliff Smyth ZS6BOX (Treasurer); Geoff Levey ZS6C; Rassie Erasmus ZS1YT; Glynn Chamberlain ZS6GLN; Dennis Green ZS4BS; Louw Erasmus ZS6LME; Leon Uys ZR6LU; Etienne Naudé ZS6EFN.

Question 2

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

The SARL supports the initiative and believe it will add value to protecting the Radio Frequency Spectrum

Questions 3 and 4

The SARL has at this time no comment

Question 5

In South African context, what are the benefits for the Authority collaborating with other regulatory institutions/organisations/states?

The SARL believes, in the principle, that one should not re-invent the wheel if other reputable agencies acknowledged by the ITU and National and International Standards bodies have already done so. The SARL believes that ICASA and South Africa can derive great benefit from collaboration with the institutions mentioned above.

Question 6

The SARL has at this time no comment.

Question 7

In your definition/understanding, what ICT equipment can be classified as low risk and may be considered for equipment authorisation exemption?

Amateur radio does not pose a risk as radio amateurs are licenced after writing a technical examination that tests their knowledge of interference. The Amateur Radio licence conditions include provisions for immediate shutdown of transmission should interference occur as a result of amateur radio transmissions.

This view is supported by international organisations such as CEPT, FCC and the European Union.

Question 8

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

In terms of amateur radio, the SARL answer to this question is the same as the answer to question 7 i.e

Amateur radio does not pose a risk as radio amateurs are licenced after writing a technical examination that tests their knowledge of interference. The Amateur Radio licence conditions include provisions for immediate shutdown of transmission should interference occur as a result of amateur radio transmissions.

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In general the development of EMC/EMI standards by SABS under the ICASA/SABS MoU agreements is an important element followed by the gazetting of appropriate EMC/EMI regulations by ICASA and subsequent rigid enforcement.

The SARL will support the mitigate of risks by education of the users, in our case the radio amateurs.

Question 9

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

The SARL proposes that ICASA should develop closer cooperation with National Regulator for Compulsory Specifications, and SARS Customs and Excise to stop the importation of equipment and systems that do not comply with the South African Regulations.

The SARL also proposes that ICASA strengthens their inspectorate to enable prompt response to complaints and action taken against persons and companies who transgress ICASA regulations.

Question 10

The SARL has no comment at this time.

Thank you for the opportunity to participate in the process. The SARL is eagerly awaiting the ICASA process to address exemption of type approval.

Yours sincerely

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SARL President

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SARL Manager Regulator affairs

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