Question 1

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

Answer 1

We think that ICT equipment shall be constructed that it both effectively uses and supports the efficient use of radio spectrum in order to avoid harmful interference. For it, having conformity assessment procedure is essential.

Question 2

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

Answer 2

Yes, we think so.

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?

Answer 3

We believe that there are no missing steps in figure 10.

Question 4

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

Answer 4

We would like you to suggest implementing the conformity assessment procedures specified in EU Radio Equipment Directive 2014/53/EC.

Step 1: whether ICASA national standards, international or other regions standards which are identical to the ICASA national standards exist or not.

Step 2, In case the answer to step 1 is Yes, basically SDoC by manufacturer should be accepted.

In case the answer to step 2 is No, testing by manufacturer should be accepted then the test report should be reviewed by certification bodies certified by ICASA and the certified body should issue the certificate. Based on the certificate, manufacturer shall issue the SDoC. For details, could you please refer to the attached EU RED and text highlighted in yellow. In case of EU RED, there is no requirement for lab authorization.

Regarding the registration requirement, we would like you to suggest implementing the registration requirement in the EU RED in the future. In case of EU, registration shall be made to the EU Commission in case the radio equipment is

“low level of compliance”. The definition of “low level of compliance” shall be reported by each Member States by 13th June 2018. However, it has not been clarified yet. For details, could you please refer to the attached EU RED and text highlighted in green.

Question 5

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

Answer 5

We as manufacturer welcome if ICASA could accept e.g. DoC under EU RED, certification under USA FCC CFR47 Part15 Subpart C and/or certificates/type approval issued by other countries.

Question 6

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

Answer 6

We would like to propose you to implement SDoC II or SDoC IV. Please refer to Answer 4.

Question 7

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

Answer 7

We would like to propose you to exempt receiver categories such as GNSS (Global Navigation Satellite System) a Passive NFC (near field communication) from ICASA radio regulation.

Question 8

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

Answer 8

We believe that ICASA should rely on the SDoC evaluated by manufacturer then we would like you to propose to focus on the market surveillance.

In line with other countries, ICASA should accept test reports from ILAC scheme members.

Question 9

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

Answer 9

We would like you to propose to study/refer the market surveillance system established in the EU.

e.g. :

https://ec.europa.eu/consumers/consumers_safety/safety_products/rapex/alerts/repository/content/pages/rapex/index_en.htm

Question 10

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

Answer 10

There may be a possibility of challenge that test sample cannot be prepared if sample submission is required but the production of it has already been terminated. Besides, there may be a possibility that test results between by manufacturer and by authority are different due to the different of used lab.

This is in regard to POST-MARKET surveillance. Pre-market surveillance should not present a problem with regards to providing samples.