



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

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Submitted via consultation_radio@ic.gc.ca

September 19, 2014

Hughes Nappert
Manager, Regulatory Standards
Industry Canada
365 Laurier Avenue
Ottawa, Ontario K1A 0C8

Re: *Comments of the Telecommunications Industry Association to Industry Canada in Response to CB Notice 2014-03, CB Announcement Consultation on Electronic Labelling*

Dear Mr. Nappert:

The Telecommunications Industry Association¹ (TIA) submits these comments to Industry Canada (IC) in response to CB Notice 2014-03, *CB Announcement Consultation on Electronic Labelling*,² in which an electronic labeling (eLabeling) allowance is proposed for devices with an integrated display screen. TIA commends IC in putting this proposal forward, which will to ease technical and logistical burdens on manufacturers while increasing end user access to useful information about their devices by allowing for the non-exclusive use of eLabeling of radio frequency (“RF”)-emitting and terminal information and communications technology (ICT). We urge IC to move forward and finalize this allowance as soon as possible.

We believe that IC recognizes that Canada, like other important markets, benefits greatly from the competitive nature of the global ICT equipment market. This environment presents unique challenges to ensuring governments, consumers, and other stakeholders to

¹ TIA is a North American trade association based in the Washington, DC area which represents hundreds of global ICT manufacturers, vendors, and suppliers. For more information, we urge you to view TIA’s Policy Playbook, which provides further information on TIA, an overview of the ICT market, technologies, and policy recommendations to drive innovation and investment in the ICT field. See <http://www.tiaonline.org/policy/tia-2013-playbook>.

readily determine whether a device has been properly certified, and to obtain additional information about a device as efficiently as possible. Historically, the use of physical markings or labels have played a key role in providing this important information, but the continuous evolution of industrial design and multiple regulatory environments has led to increased costs and difficulty in ensuring all relevant markings or labels are affixed in an efficient and convenient manner for the user of the device. eLabeling has become a natural progression from hard copy labels which will help in streamlining and lowering costs in the manufacturing process, eliminating typographical errors which sometimes appear on hard copy labels, and improving the approval processes by providing ease of access to information for the various constituencies in the device approval process, including IC.

We support the proposals in CB Notice 2014-03 reflecting broad stakeholder consensus that an effective solution to this problem is the non-exclusive use of eLabeling for RF-emitting and terminal ICT equipment, which allows consumers and other users access to easily readable and prominently displayed information about each device. In order to address concerns related to Canadian customs, TIA supports putting needed information on packaging labels that includes required regulatory markings and other important information including proper device care, electronic recycling programs, and warranties.

IC's proposals position it as a leader in the use of regulatory approaches which foster innovation and advance public policy goals, and are also harmonized with the Federal Communications Commission's July 11, 2014-issued guidance document putting forward an eLabeling allowance for devices with integrated screens.³ We commend IC for their inclusive approach to working with the industry to advance the public interest through this consultation.

³ See <https://apps.fcc.gov/oetcf/kdb/forms/FTSsearchResultPage.cfm?id=27980&switch=P>.

TIA supports the proposals put forward in CB Notice 2014-03, and we strongly encourage IC to move forward with the non-exclusive use of eLabeling for RF-emitting and terminal ICT equipment as swiftly as possible.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Brian Scarpelli _____

Brian Scarpelli
Director, Government Affairs

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