



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

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Mr. Richard Bean
Acting Chairman and Chief Executive Officer
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

28 September 2017

Remaking the EMC Legislative Instruments (IFC: 21/2017)

Dear Mr. Bean,

The Telecommunications Industry Association (TIA)¹ represents hundreds of companies that manufacture or supply information and communications technology (ICT), the majority of which are directly impacted by rules governing the evaluation and approval of RF devices. TIA appreciates ACMA's focus and attention to important authorization issues which impact manufacturers' and vendors' ability to provide innovative products and services to diverse markets around the world. TIA supports the forward-looking labeling regulations already in place in Australia, but believes ACMA can do even more to support commerce and innovation while protecting consumers and ensuring the quality of RF devices brought to the Australian marketplace.

First, ACMA should continue to expand its electronic labeling allowances by **adding an allowance for screen-dependent devices** which can only practically be used when connected to an external display (e.g. television set-top boxes, wireless heart rate monitor straps, and Bluetooth headphones). This allowance not only allows manufacturers the flexibility to keep devices and labels up-to-date more easily through software updates, but also makes verification and identification information more accessible to the user.

With respect to conventional labeling, ACMA can further increase the scope of allowances by **permitting manufacturers to substitute conventional labels with links to Internet URLs**, which access databases where licensing and certification information is stored. Allowing vendors to store device registration and certification information online allows them to keep these device information libraries up-to-date and robust, offering a convenient location for a user to learn more about his or her device.

TIA commends ACMA for keeping its electronic labeling rules permissive and allowing manufacturers flexibility to innovate in their designs only if they see fit. Accordingly, TIA recommends that any future rules ACMA implement continue to be implemented on a non-mandatory basis—even those rules that function as a “relaxation” of existing rules.

TIA thanks ACMA for the opportunity to comment on this consultation and looks forward to future collaboration.

Sincerely,

/s/ Dan Henry

Dan Henry
Senior Manager, Government Affairs
Telecommunications Industry Association

¹ TIA is a Washington, DC-based trade association and American National Standards Institute (ANSI)-accredited standard developer that represents the global information and communications technology (ICT) manufacturer, vendor, and supplier community. TIA represents approximately 250 participating companies producing products and serves empowering communications in every industry and market, including healthcare, education, security, public safety, transportation, government, and the military, the environment, and entertainment. <http://tiaonline.org>