

DIGITALEUROPE position RRA Public Notices No. 2014-91 and 2014-92

Brussels, 30 October 2015

We respectfully submit the following comments about the content implementation schedule of the new standards mandated by these Public Notices on “Test Methods for Electromagnetic Interference and Test Methods for Electromagnetic Susceptibility for Broadcasting Communications Equipment”.

Under Article 4 of the test methods noted above, as of January 1, 2016, multimedia equipment (MME) must undergo testing to KN32 (Electromagnetic compatibility of multimedia equipment - Emission requirements) and to KN35 (Electromagnetic Compatibility of Multimedia equipment - Immunity Requirements). We believe that making those standards mandatory, as the sole way to prove conformity, is premature and not in-line with the rest of the world. Moreover, we are concerned that, due to a lack of accredited designated laboratories for conducting tests against those standards, the issuing of product approvals under these new requirements will be generate significantly delayed, during which time Korean consumers will not have access to the full range of impacted technologies.

Therefore, we respectfully make the following suggestions:

1. Delay mandatory implementation of KN32 until March 2017.

Moving from separate product standards for Audio-Video equipment and for Information Technology equipment to a single multimedia standard requires some adaptation time, for manufacturers as well as for test laboratories; IEC/CISPR recognized this and decided, during a plenary session of subcommittee I, not to withdraw CISPR 13 and CISPR 22 until 5 years after the publication of CISPR 32.

In the EU, the standard EN 55032 (which like KN 32 is based on CISPR 32) was approved in March 2012 and published in May 2012, but the citation in the Official Journal provides a transition period, until March 2017, during which EN 55032, but also the older standards, EN 55013 and EN 55022, are deemed to provide equivalent presumption of conformity.

DIGITALEUROPE recommends that RRA takes a similar approach and, until March 2017, allows manufacturers to test either against KN 32 or against the superseded standards KN22 and KN13.

Additionally, a second edition of CISPR 32 has been published in 2015, and for manufacturers moving from the previous standards to the new multimedia standards, it will be more convenient to move directly to CISPR 32 Edition 2. The proposed delay in mandatory implementation of KN 32 would give the Korean standards body as well as Korean regulatory authorities the time to align KN 32 with this second edition of CISPR 32.

2. Align KN35 on the latest version of CISPR 35

To the best of our knowledge, KN 35 is currently based on an unpublished version of CISPR 35 which did not reach international consensus, and contains several deviations from the current IEC/CISPR committee draft version of

CISPR 35, which will be voted on in early 2016 and potentially published in first half of 2016. In Europe, a version of EN 55035 based on that preliminary version of CISPR 35 was approved, but CENELEC decided not to publish it in order to avoid confusing the market.

We recommend that RRA takes a similar step and does not publish a version of KN35 based on an unpublished version of CISPR 35.

3. Align mandatory implementation date of KN35 on international practices.

As with previous IEC EMC standards it is likely that IEC/CISPR will maintain CISPR 20 and CISPR 24 for a certain time (3 or 5 years) after publication of CISPR 35. In the EU, EN 55020 and EN 55024 will continue to provide a presumption of conformity for a minimum of 3 years after publication of EN 55035.

We recommend that RRA does not make the implementation of KN 35 mandatory before a minimum of three years, after a new version, based on the published version of CISPR 35 is available; of course, this should not prevent the use of KN 35 as soon as it is published.

4. Announce the procedure to add KN32 and KN35 to lab accreditation as soon as possible.

In order to avoid delays when KN 32 and KN 35 become mandatory, we kindly request RRA to clarify the lab accreditation process. Without accreditation, labs operating under an MRA will not be able to perform the testing.

We thank you for the opportunity to offer comments on this issue of importance to the ICT industry. DIGITALEUROPE is committed to working together with RRA to ensure it meets its regulatory objectives while minimizing restrictions on trade.

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