



Newsletter

Important Regulatory Changes Spring 2017

BACL is now an OSHA NRTL

The Federal Register Notice announcing OSHA’s final decision to Recognize BACL as an NRTL was published April 6, 2017. BACL is now recognized by OSHA to perform Certification for Information Technology Equipment.

Today as BACL formally recognized as an NRTL site, an additional 8 affiliated BACL laboratories around the world are also qualified to test products for United States certification under the umbrella of our headquarter NRTL site in BACL Sunnyvale, CA.

BACL uses its own unique registered certification marks to designate product conformance to the applicable product safety test standards. After certifying a product, BACL authorizes the manufacturer to apply its registered certification mark to the product.



BACL Certification mark signifies that the product complies with the requirements of product safety test standards.

About NRTL: OSHA's Nationally Recognized Testing Laboratory

(NRTL) Program Recognizes private sector organizations to perform certification for certain products to ensure that they meet the requirements of both the construction and general industry OSHA electrical standards.



2014/53/EU Radio equipment

The Radio Equipment Directive [RED] (2014/53/EU) came into effect on June 13, 2016 and its one year transition period will end on June 12, 2017. Unfortunately, for both manufacturers of wireless/RF devices and their European importers, there are still only a small number of Standards listed in the Official Journal of the European Union (OJ) that are Harmonized under the RED. For those manufacturers and/or importers whose products are fully covered by one or more RED Harmonized Standards, the manufacturer or importer can (and should) follow RED Annex II Conformity Assessment Module A in order to legally place

their wireless/RF products on the market in Europe.

However, if there are no RED Harmonized Standards that apply to their wireless/RF products, the manufacturer or importer is **required** to follow **either RED Annex III Conformity Assessment Modules B and C, or RED Annex IV Conformity Assessment Module H.**

Most manufacturers and importers find that following the requirements in RED Annex IV Conformity Assessment Module H will be very burdensome and very expensive. As a practical matter, wireless/RF products that are not covered by applicable RED Harmonized Standards will need to follow RED Annex III Conformity Assessment Modules B and C.



Conformity Assessment Module A:

Conformity Assessment Module A applies to those manufacturers and/or importers whose products are fully covered by one or more RED Harmonized Standards.

Under **Conformity Assessment Module A**, the manufacturer or importer: performs all of the applicable tests specified in each of

the Harmonized Standards that apply to the product and documents those tests and their results in one or more formal test reports; prepares all of the additional technical documentation required in Article 21 and Annex V of the RED; affixes the CE Mark to each unit, (and to each units' packaging) in accordance with Articles 19 and 20 of the RED; makes and issues (*solely on his own authority*) a Declaration of Conformity (DoC) in accordance with Annex VI of the RED.

The product can then be placed on the market in the EU, EFTA, and EEA nations. It is and all technical material required to keep a copy of the DoC and make it available to EU authorities upon their request for a period of at least 10 years after production ceases.

Conformity Assessment Modules B and C:

Conformity Assessment Modules B and C both apply to those manufacturers and/or importers whose products are NOT covered by one or more RED Harmonized Standards (or are only partly covered by one or more RED Harmonized Standards). The use of a RED Notified Body [NB] is required in all such cases.

Conformity Assessment Module B covers the design aspects of the product, and **Conformity Assessment Module C** covers the production aspects of the product.

Conformity Assessment Module B requires the manufacturer to contract with a RED NB to examine, verify, attest to, and report on the correctness and applicability of the technical documentation (supplied by the manufacturer) that is required in Article 21 and Annex V of the RED, and, of the Risk Assessment required in Annex III item 3(c). If the RED NB finds that the manufacturer-supplied

documentation is adequate to substantiate the claim of conformity of the *product's design* to the "Essential Requirements" of the RED (as stated in Article 3 of the RED), the NB will then issue an *EU Type Examination Certificate* to the manufacturer for the product. This certificate will typically contain limitations as to the scope, expiration date, or condition; in such cases, the NB is required to notify the authorities in the various nations in the EU.

Once the manufacturer has received the *EU Type Examination Certificate* from the NB, the manufacturer must then comply with the requirements of Conformity Assessment Module C before placing his product on the market in the EU, EFTA, and EEA Nations.

Specifically, **Conformity Assessment Module C** requires the manufacturer to affix the CE Mark on each unit, (and to each units' packaging) in accordance with Articles 19 and 20 of the RED, and to make and issue a DoC in accordance with Annex VI of the RED.

It is important to note that in order to be valid, a DoC issued in accordance with Conformity Assessment Module C must (in addition to all other items listed in Annex VI of the RED) specifically cite the certificate number, issue date, NB identification number, and a summary description of the contents of the EU Type Examination Certificate issued by the NB.

The product can then be placed on the market in the EU, EFTA, and EEA nations. It is and all technical material required to keep a copy of the DoC and make it available to EU authorities upon their request for a

period of at least 10 years after production ceases.



FCC ET Docket No. 16-313

DA No. 17-275

The Office of Engineering and Technology (OET) is pleased to inform you that the scope of recognition for the National Voluntary Accreditation Program (NVLAP) has been expanded to include the accreditation of testing laboratories located in non-MRA countries, identified in your Request for Recognition, dated July 6, 2016, that seek recognition by the Commission to perform testing of telecommunication equipment subject to the Commission's rules. It is the responsibility of the accreditation body to review the qualifications of a test laboratory's personnel, management systems, record keeping and reporting practices; to send recognized experts to observe testing at the laboratory; and to verify the testing laboratory's competence to perform tests in accordance with FCC-related measurement procedures.

FCC ET Docket No. 16-313

DA No. 17-274

The Office of Engineering and Technology (OET) is pleased to inform you that the scope of recognition for the American Association for Laboratory Accreditation (A2LA) has been expanded to include the accreditation of testing laboratories located in non-MRA countries identified in your Petition for Recognition, dated July 1, 2016, that seek recognition by the Commission to perform testing of telecommunication equipment subject to the Commission's rules. It is the responsibility of the accreditation body to review the qualifications of a test laboratory's personnel, management systems, record keeping and reporting practices; to send recognized experts to observe testing at the laboratory; and to verify the testing laboratory's competence to perform tests in accordance with FCC-related measurement procedures.



RSS-247 issue 2

The purpose of this notice is to announce that Innovation Science and Economic Development (ISED) has published the following standard on February 23, 2017:

RSS-247 — Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and License-Exempt Local Area Network (LE-LAN) Devices

Listed below are the changes:

1. New section 3.3: states the requirement for emissions that fall within restricted frequency bands to comply with the provisions in RSS-

Gen, General Requirements for Compliance of Radio Apparatus;

2. Section 5.4(b): reinstates the former e.i.r.p. limit for frequency hopping systems operating in the band 2400-2483.5 MHz, which employ a hopset with less than 75 channels;

3. Section 6.2: adds a clarification to ensure that emissions that fall within restricted frequency bands shall comply with the provisions in RSS-Gen;

4. Section 6.2: states the measurement method for power and unwanted emission limits for license-exempt local area network devices and digital transmission systems operating in the 5 GHz band;

5. Section 6.2.1 and 6.2.2: adds a provision to allow original equipment manufacturer (OEM) devices installed in road vehicles to operate in the band 5150-5250 MHz with an e.i.r.p. limit of 30 mW or $1.76 + 10 \log_{10}B$, dBm, whichever is less stringent;

6. Section 6.2.1.2: clarifies the requirement for devices operating in the band 5150-5250 MHz, which have bandwidth that falls into the band 5250-5350 MHz;

7. Section 6.2.2.2 (b): permits the requisite "for indoor use only" notice for equipment operating in the band 5250-5350 MHz to be included in the user manual;

8. Section 6.2.2.3: applies the requirement of e.i.r.p. at different elevations for equipment operating in the band 5250-5350 MHz to outdoor fixed devices only;

9. Section 6.2.2.3: limits e.i.r.p. of OEM devices installed in road vehicles to 30 mW or $1.76 + 10$

$\log_{10}B$, dBm, whichever is less stringent;

10. Section 6.2.2.3: allows equipment, other than outdoor fixed devices, operating in the band 5250-5350 MHz having e.i.r.p. greater than 200 mW to either comply with the e.i.r.p. elevation mask or to include a firmware feature to reduce their e.i.r.p. permanently should it be requested by the Department;

11. Section 6.2.3.2: allows equipment operating in the band 5650-5725 MHz with bandwidth overlapping the band 5725-5850 MHz to meet the emission limit of -27 dBm/MHz e.i.r.p. at 5850 MHz;

12. Section 6.2.4.2: modifies the unwanted emission limits for LE-LAN devices and DTSs operating in the band 5725-5850 MHz;

13. Section 6.2.4.2: adds a transition date for certification of LE-LAN devices and DTSs operating in the band 5725-5850 MHz to have unwanted emissions comply with either provisions in section 5.5 or section 6.2.4.2;

14. Section 6.2.4(b): adds a transition date for manufacture, importation, distribute, lease, offer for sales, or sales of LE-LAN devices and DTSs operating in the band 5725-5850 MHz which do not comply with provisions in section 6.2.4(b); and

15. Annex A: deletes the word "pre-installation" to clarify that the verification of e.i.r.p. compliance at different elevations for devices operating in the band 5250-5350 MHz needs to be done at the time of certification (before installation); the verification of compliance must be submitted with the test report for equipment requiring certification.