المجلــــس الأعلــى للإتصــالات و تكنولوجيــا المعلومــات
Supreme Council of Information & Communication Technology

ict رهق QATAR

**Consultation on Type Approval Policy –**

# Responses Submitted to ictQATAR

The Supreme Council of Information & Communication Technology "ictQATAR"

Telecommunications Regulatory Authority

**30 August 2009**

On 26 April 2009, ictQATAR published a consultation document on "Type Approval Policy for Radio Equipment and Telecommunications Terminal Equipment" and requested written comments from interested parties.

Eighteen responses were submitted by the following parties (listed in alphabetical order):

1. 3Com International (Dubai)

2. Cisco Systems International (Dubai)

3. Denso Corporation (Japan)

4. Eastern Technology Systems (Qatar)

5. Fujitsu (Japan)

6. International Compliance Management (UK)

7. Pacific Industrial (Japan)

8. Panasonic Corporation (Japan)

9. Pioneer Corporation (Japan)

10. Qatar Telecom (Qtel) Q.S.C.

11. QSAT Communications (Qatar)

12. RigNet Qatar

13. Schlumberger Overseas (Qatar)

14. SES (Netherlands)

15. Tokai Rika (Japan)

16. Valeo Security Systems (France)

17. Visteon (Japan)

18. Vodafone Qatar Q.S.C.

As part of the consultation process and in the interest of transparency and public accountability, ictQATAR is herein publishing all the responses submitted.

# 3Com International

**Page 11 - Q.2**
The list is ok, but if a type approval is obtained by an authorised importer (not a manufacturer) the type approval should only be valid for that authorised importer. See Q.3 below.

**Page 11 - Q.3**
If the type approval is paid for and obtained by one authorised importer, it does not appear fair that a second authorised importer can use this to import the equipment as well. Some importers will wait for others to do the work in order to save cost. If the type approval is paid for by a manufacturer e.g. 3Com then making the type approval available to all authorised importers is ok.

Maybe there should be a 2 tier system where a manufacturer type approval application covers ALL authorised importers, but an authorised importer's type approval application is only applicable to that importer.

For 3Com the 2 tier system may also provide a certain amount of control against grey imports if the local office made the applications as an authorised importer rather than a manufacturer.

**Page 13 - Q.4**
Is a unique application required for each model or can an application be made for a family of products?
What is the process and/or requirements for laboratories / type approval bodies to become accredited?

**Page 14 - Q.5**
What is the difference between the accredited laboratories / type approval bodies in this section and the ones in section 4.2.1?

**Page 17 - Q.10**
See Q.3 above.

**Page 19 - Q.13**
See Q.3 above.

regards

Yahya Kassab
Territory Manager

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![CISCO]

> Question 1: ictQATAR invites comments about the scope and objectives of the proposed Type Approval Policy.

- (Q1) Cisco is appreciating the initiative taken by IctQatar in order to replace the current type approval regime with a newer, much simpler and efficient one and which can be even completed by companies (e.g. manufacturers) based outside Qatar.

> Question 2: ictQATAR seeks views on the proposed parties that can apply for Type Approval.
>
> Question 3: Do you have any comments about the proposal that once a type of RTTE is approved by ictQATAR, any eligible importer can import the same type of RTTE?

- (Q2) Cisco, being one of the international manufacturers for telecom equipment, would be delighted to apply for Type Approval on behalf of its partners in State of Qatar. This option being available in the new regulation will help facilitate the clearance process for each shipment and therefore boost sales and importation of R&TTE into the country.
- (Q3) Type approvals obtained by Cisco and being made available to all importers will also help facilitate the importation process for all R&TTE and will avoid the administrative process to be repeated by ictQATAR for the same product. However, Cisco, as a manufacturer, has a list of authorized partners to sell its products in the State of Qatar. We cannot be held responsible for actions by non-authorized dealers.

> Question 4: Do you have any comments about the Simplified Type Approval Process. In particular, are there any other requirements that should be submitted with the Type Approval application?

- (Q4) We would like to comment on the "copy of the warranty document" to be provided for the simplified type approval process. All Cisco hardware and software products are covered for a minimum of 90 days. Some product warranties may vary. Please review the information on this page http://www.cisco.com/go/warranty for complete warranty details across the Cisco product line. All Cisco warranties apply to the Customer or Original Owner (the individual who purchased the product for their own use) also referred to as the End User; and are not transferable. In addition, Cisco offers different types of service contracts to extend the life of the customer's IT investment. There are different levels of services offered; one of them is "Advanced Hardware Replacement" which includes both Cisco Technical Assistance Center (TAC) Support and hardware replacement.

   ictQatar should take into consideration the type of telecom equipment in hand. Advanced networking equipment usually have a different type of warranty.

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Only authorized dealers (by Cisco) should be allowed to complete the type approval procedures and to offer warranty for Cisco products. We cannot be held responsible for actions by non-authorized dealers.

Another point: as we do not have a complete list of "accredited laboratory or a type approval body" recognized by ictQatar, we would recommend to add to this list the telecom regulatory bodies in the GCC states (if not already added) in order to take a step further in unifying the standards and regulations in the region, by automatically approving all products which are already type approved in any of the other GCC countries, and therefore, supporting the main objective of the Gulf Standardization Organization (GSO).

> Question 5: Do you have any comments about the Standard Type Approval Process. In particular, are there any other requirements that should be submitted with the Type Approval application?
>
> Question 6: Do you have any comments about having two Type Approval processes?

- (Q5) Same as the previous question (Question No. 4)
- (Q6) No Comments.

> Question 7: Are there any particular criteria or issues that ictQATAR should take into consideration in determining the recognized standards?

- (Q7) We suggest ictQATAR to adopt ETSI Standards for R&TTE.

> Question 8: Do you have any comments about the validity period of Type Approvals?

- (Q8) We agree that the validity of Type Approvals should be unlimited.

> Question 9:   Are there any comments about the proposed fees?

- (Q9) We have no comments on the proposed fees providing we can apply for type approval for a family of identical products (product series).

> **Question 10:** Are there any comments about the proposed importation process? In particular, do you support the proposal that an Authorized Importer can import any RTTE (from any brands) that (i) has been type-approved by ictQATAR and (ii) contains a valid warranty for customers in Qatar?

- (Q10) Again, ictQatar should study the Warranty validity period on a case-by-case basis taking into consideration the type of the imported telecom equipment. Also, only **'authorized'** dealers/importers will be covered by the manufacturer's warranty. Cisco, as a manufacturer, has a list of authorized partners to sell its products in the State of Qatar.
- (Q10) Also, we cannot be held responsible for the importation or type approval procedure initiated by importers for Radio equipment not fully compliant with the Frequency Allocation Plan of ictQatar.

> **Question 11:** Is there any specific information that should also be included in these registers?
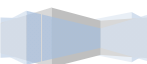
- (Q11) No comments.

> **Question 12:** ictQATAR invites comments about the proposed policy for customs clearance

- (Q12) No comments.

> **Question 13:** ictQATAR invites comments about the proposed policy for selling RTTE in Qatar.

- (Q13) The Warranty validity period should be studied on a case-by-case basis taking into consideration the type of the imported telecom equipment. In addition, the manufacturer can not be held responsible for warranty of products imported by companies (importers) not recognized ("authorized") by the manufacturer.
- (Q13) Maintaining a list of wholesalers and/or retailers is an administrative burden without bringing any value as at the end it does not cover sales over the internet etc…

> **Question 14:** Are there any specific comments or issues regarding the proposed marking and labeling policy?

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(Q14) No Comments as long as the general conditions and requirements of the CE marking are fully accepted by ictQatar.

**Question 15:** Do you support this market surveillance and enforcement policy for RTTE?

Are there any specific suggestions in this regard?

(Q15) Yes, Cisco is always committed to doing business in compliance with applicable laws. We encourage ictQatar to take appropriate actions whenever a non-compliance issue takes place. However we can NOT be held responsible for incorrect actions by any of our importers.

**Question 16:** Are there any specific issues that should be addressed at this stage to ensure a proper transition from the current Type Approval Regime to the new one?

(Q16) No.

**Question 17:** Are there any other subjects or issues that should be addressed in the Type Approval Policy?

(Q17) We believe the issue about responsibility should be further clarified. We agree that importers should be able to apply for Type Approval, but we can not be held responsible for any of their actions which might be in conflict with the ictQatar regulation.

# DENSO

**Q1**

We strongly support the policy that a wide range of persons such as manufacturers, Authorized Importers, licensed Operators and end-user companies can apply for Type Approval.

**Q2**

We would like the item a) of 4.1 Type Approval Applicants to be "Local or international manufacturers" instead of "Local and international manufacturers". We believe that it will clarify who can be applicants of Type Approval and strengthen the policy that a wide range of persons can apply for Type Approval".

**Q3**

We support the proposal.

**Q4**

We strongly support the Simplified Type Approval Process for a reason that it will decrease burdens on both the authority and applicants.

In order to achieve free movement of RTTE, we would like to propose following things related to the Simplified Type Approval Process.

<u>a) Accredited laboratory</u>

We would like a list of accredited laboratories to be made public. Meanwhile, we would like to propose other option to be an accredited laboratory as follows.

> *Any laboratory can be deemed as "accredited laboratory" by ictQatar if one of the following conditions is met:*
>
> *a. ISO10725 accredited by an national or international accreditation body; or*
>
> *b. A membership of the International Laboratory Accreditation Cooperation (ILAC)*

<u>b) Type Approval body recognized by ictQatar</u>

We believe that FCC-approved or CE marked RTTE is under the scope of the Simplified Type Approval, and "Grant of Equipment Authorization" issued by FCC (or TCB) or "Declaration of Conformity" stating the conformity to EN standards, are accepted as an application document.

Also, in order to allow internationally-approved products to be introduced into your market more smoothly, we would like to propose to add more approval bodies of other countries such as Indonesia, Korea, Singapore, Taiwan, Jordan, South Africa, and Morocco.

**DENSO**

c) Copy of the warranty document

From our experiences in obtaining type approval from other countries, a copy of the warranty document has not been required. Especially, as for RTTE to be fitted into vehicles, such documents are not prepared for each RTTE. Since vehicles including fitted RTTE are approved by GSO (GCC STANDARDIZATION ORGANIZATION) under harmonized requirement in GCC, we consider that submission of a copy of the warranty document for each RTTE for vehicles is not necessary. Under such circumstances, we would like a submission of a copy of the warranty document to be exempted for RTTE to be fitted into vehicles.

Q5

We would like to propose following thing related to the Standard Type Approval Process.
a) Copy of the warranty document
As we stated in Q4-c), we would like a submission of a copy of the warranty document to be exempted for RTTE to be fitted into vehicles.

Q6

Actually, two Type Approval processes seems to be complicated for some applicants, however, we support these processes as long as the subject RTTE under each process is clearly defined.

Q7

We strongly support your policy to Technical Standards. We believe that FCC regulations (such as Part 15) and EN standards will be one of recognized standards, and hope that a list of recognized technical standards will be published on your website soon.

Q8

We strongly support the "unlimited duration". We believe that it will decrease burdens on both the authority and applicants.

Q9

We consider that the proposed fees are quite reasonable and proper.

Q10

In order to achieve free movement of RTTE, we would like to support the proposal that no additional documentation is required for the importation of type-approved RTTE, which is also classified into License-Free Radio Equipment.

Q11

We would like the TA Register includes information of the registration date of RTTE.

**DENSO**

Q12

We support the proposed policy for customs clearance.


Q13

We support the proposed policy for selling RTTE in Qatar.


Q14

We strongly support the proposed marking and labeling policy. Especially, for "Simplified Type Approval Process", adoption of marking such as CE, FCC, etc. will lead elimination of additional time and cost required for preparation of additional markings. Owing to this, manufacturers can put ahead timing of the introduction of products to your market soon after obtaining approvals for their products.


Q15

We strongly support the market surveillance and enforcement policy for RTTE.


Q16

We strongly support the transitional provisions. Especially, we would like to welcome the inclusion of type-approved RTTEs prior to the implementation of the new regime in the TA Register.


Q17

We have some more suggestions about the new policy.

a. License policy (on page 7)

We hope that a complete list of the types of Radio Equipment in each of two categories, License-Free Radio Equipment and Licensed Radio Equipment, will be published soon.

However, as for RTTE to be fitted into vehicles, we would like them to be exempted from the scope of license. In other words, we would like such equipment to be classified into "License-Free Radio Equipment" in order to prevent customers who buy vehicles from obtaining licenses individually.


b. 4.5 Modifications to Type-Approved RTTE (on page 15)

We would like to propose a categorization of modifications according to the degree as follows:

Class I modification

The modification having no effect* on RTTE conformity against Standard/requirement is classified under Class I modification. In this case, a new application is not required.

*For example, changes in size, shape, color of material of enclosure. If any electrical change is made, the tolerance for radiated spurious emission measurement is +/-3 dB.

Class II modification

The modification having effect* on RTTE conformity against Standard/requirement is classified under Class II modification.

In this case, a new application is required.

**DENSO**

*For example, the tolerance for radiated spurious emission measurement is beyond +/-3 dB.*

*Also, such modifications include:*

*-modifications of transmitting antenna*

*-Modifications of transmitting power or radiation characteristics*

*-modifications of interface card*

*-addition of interface card*

We truly welcome the new policy, which seems quite beneficial to manufacturers, importers, and users, and hope that the new scheme will be introduced soon.

However, as one of manufacturers of RTTE, we really appreciate your careful review of this new policy and prior notice to the public* before the introduction of the new regime.

*We also hope that guidelines, rules, procedures and forms outlining how the policy will be implemented will be published soon.

## شركة الشرق للأنظمة التقنية ذ.م.م.

# Eastern Technology Systems Co. w.l.l.

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OUR REF : ETS/15359/AKP                DATE : 30 MAY 2009

TO      : SUPREME COUNCIL OF INFORMATION & COMMUNICATION TECHNOLOGY
          (ictQATAR)
          P.O. BOX 23264
          DOHA, QATAR

FAX : BY EMAIL

## TYPE APPROVAL POLICY FOR RADIO EQUIPMENT AND TELECOMMUNICATIONS TERMINAL EQUIPMENT – CONSULTATION DOCUMENT

Dear Sir,

With reference to the above Consultation Document, we are grateful to ictQATAR  for having invited us for our comments and views and we  are pleased to offer our comments and recommendations as follows :-

**Question 1** :     ictQATAR invites comments about the scope and objectives of the proposed Type Approval Policy.

**Answer 1**  :  *  We wish to thank ictQATAR for inviting us for our comments.

- Yes, we feel that existing rules and regulations are quite good but there is always some scope to modernise and streamline the current Type Approval regime. This will introduce a greater level of efficiency, transparency and certainty.

- Indeed ictQATAR should be the supreme body to decide on the Type Approval.

**Question 2** : ictQATAR seeks views on the proposed parties that can apply for Type Approval.

**Answer 2**   : * Under heading Definitions : **Licence-Free Radio Equipment(page 7 of 28)** : As we are a radio communications company(Motorola Distributor), we shall restrict this answer to Licence-Free Radio Equipment. Motorola Manufactures many Licence-free radios for example Motorola's TalkAbout radios. These radios are available in any super market in UK/USA and even at Heathrow Airport. They are available ranging from US$ 100 to US$ 150 per radio. In the past, on two occasions customers brought these radio and when they were stopped by the customs at the Airport, they approached us to help them in clearing the shipment for which we refused and advised them to approach ictQATAR for Import Permission. As any radio (whether Licence –Free or Licensed) has RF  transmissions and is likely to affect other radios or equipments, strictly such radios should NOT  be allowed to be imported and such radios should not be considered as Licence-Free radio, although in other parts of the world they may be considered as Licence-Free radios.

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- Many customers approach us for radios for their **personal use**. Initially when we ask them to get ictQATAR Permission, they say "No problem" after wasting our time for two hours, they go back and never come back to us. Many of them have told us that they do not want to be involved with either ictQATAR or Q-TEL for any permission etc. Hence, our suggestion is that at Shania, a full-fledged TETRA system should be installed (specially for Camel Racing) so that they can buy and use Tetra Radios. Also, instead of Qrs. 99.00 which is charged for every radio per month should be reduced to about Qrs. 50 .00 With this instead of using unauthorized radios and unauthorised frequencies, they can use authorized Tetra radios

**Question 3** : Do you have any comments about the proposal that once a type of RTTE is approved by ictQATAR, any eligible importer can import the same type of RTTE;

Answer 3 : No, this should not be recommended. Reasons are as follows :-

- Let us say, a particular model of Motorola radio (for example GP340) is Type Approved by ictQATAR. We as Motorola Distributor got this radio Type Approved by working hard (not only for getting the Type Approval but determining and committing with Motorola that we shall be able to sell these radios worth US$ 1 million per year. There may be many eligible importers in Qatar to Import Radio equipment and their names may be available in TR (Type Approval Register) on ictQATAR's website or at Customs at Doha Airport. This eligible importer can get these radios from any Motorola Distributor throughout the world. But, **he should not be allowed to import these radios unless he is a proper Distributor of Motorola**.

- A Type Approval for any particular equipment should **NOT** mean that anyone can import them. Only the Authorized Distributors should be allowed to import these radios.

- Fortunately, since **ictQATAR** has come into existence, lot of good things have happened. Otherwise, earlier we have noticed that when there used to be tenders announced through the newspapers or otherwise, we were shocked to notice that building materials supplier companies who even do not know about the subject, they even have been participating in those tenders through their contacts in foreign countries. Fortunately, it is no more happening.

**Question 4** : Do you have any comments about the simplified Type Approval Process. In particular, are there any other requirements that should be submitted with the Type Approval application ?.

**Answer 4** : * Generally with the Type Approval Application, we always submit the brochure of the equipment. In the brochure itself it is mentioned as to from which accredited laboratory the equipment is Type approved, for example ETSI, CE etc. This should be a sufficient proof that the equipment has already been Type approved by some international agency. Hence, these should be no need for attaching any Type Approval Certificate from such agency.

- Copy of warranty document is not required to be attached with the Type Approval application because in any case we give at least one year warranty (and in many case even two years warranty) to various customer at the time of offering the equipment.

- The present system which is already being followed by ictQATAR is quite good and efficient.

**Question 5** : Do you have any comments about the Standard Type Approval Process. In particular, are there any other requirements that should be submitted with the Type Approval application ?.

**Answer 5** : * Copy of warranty document is **not** required as mentioned in Answer 4 above.

**Question 6** : Do you have any comments about having two Type Approval Processes ?.

**Answer 6** : Yes, it is a good idea to have two processes so that time and effort is not wasted for getting the Type Approval for those equipment which are already Type Approved by other international agencies.

**Question 7** : Are there any particular criteria or issues that ictQATAR should take into consideration in determining the recognized standards ?.

**Answer 7** : The minimum standards **only** should be mentioned. For example, if a Marine Radio standard is to be mentioned, it should restrict the minimum frequency band from 154.40 to 163.75 MHz. The manufacturers may offer from frequency band 136 to 174 Mhz which is fine. As Marine radios have a channel bandwidth of 25 Khz, it should not be restricted to 12.5 kHz even though there are many radios available with 12.5 Khz channel bandwidth.

**Question 8** : Do you have any comments about the validity period of Type Approval ?.

**Answer 8** : Yes, unlimited duration of Type Approval will be very good for the manufacturers, distributors as well as for ictQATAR because every year or every two years we do not have to apply again and again. Here is an example : Sailor brand of radios from Thrane & Thrane are famous worldwide and about 90% of the ships and boats etc use these radios. Also, many companies (e.g. QP, RASGAS, QATARGAS, MAERSK etc) need these radios for shore-to-ship communications. However, as on date, State of Qatar does not have any Sailor distributor. We were the distributor earlier but since the year 2008 Thrane & Thrane has cancelled distributorship of all Middle East distributors (including Bahrain, Kuwait, Oman etc) and they have put a Master Distributor in Dubai. Hence, when a customer needs a Sailor radio (for example RT2048), when we apply for Type Approval, we have to pay Qrs. 2000 .00 and for that too, a receipt is given(not Type Approval Certificate) which is valid for only six months. As this type of radio is not a fast selling radio, the requirement from the customers is sometimes only for one or two radios. Then the next requirement may come only after 6 months. That time again we

have to pay another Qrs. 2000 .00. Hence, in the bargain, we have to add this Qrs. 2000.00 in the price quoted to the customer. Now a days customers also have become smart – they simply ring up some other distributor in Dubai or even Thrane and Thrane in Denmark or even they see on the website and they find out that we are charging Qrs. 2000.00  more than what it should be. Ultimately, either they do not buy or they go in for cheaper option. Hence, if the Type Approval for such kind of items is given for unlimited duration, it will help all.

**Question 9** : Are there any comments about the proposed fees ?.

**Answer 9** : No comments. The proposed fee is quite OK.

**Question 10** : Are there any comments about the proposed importation process ?. In particular, do you support the proposal that an Authorized Importer can import any RTTE (from any brands) that (i) has been type-approved by ictQATAR and (ii) contain a valid warranty for customers in Qatar ?.

**Answer 10** : We would **NOT** like to support this process due to following reasons :-

- Please refer clause 4.7 (c) page 16 of Consultation Document. Persons (individuals) should not be allowed to import RTTE for their own use that too without authorization from ictQatar. If this is allowed, a person will simply access the TA Register of ictQATAR, and then he finds that some model of Motorola or other radio is Type approved and simply he will import the radio without even the local Distributor in Qatar. Then when he gets the radio, he will come to us for programming of frequencies allotted by ictQATAR or even otherwise. Then when he finds some problem or mal-functioning in the radio, he will come to us stating that the radio covers international warranty. Hence, for that, even if we (our company)  have to spend money to repair that radio, we cannot charge from the customer. Then the problem of getting the warranty transferred from the place from where he purchased the radios to us comes and for a very small amount of gain, we have to do all the documentation and paper work. In one of the cases, the customer brought radio which he bought in USA and wanted us to program it without even any Import Permission from ictQATAR. However, we refused him stating that unless there is a proper authorization from ictQATAR, we will not program the radio. There have been many such cases like this in the past. In any case, we as distributors cannot control any individual bringing such radios but at least we can always ask him to  go to ictQATAR for proper permission.

- Any one (whether a company or individual) should have a proper Import Permission from ictQATAR if he wants to buy any radio

- He should be authorized to buy only from the Authorized Distributor in Qatar, not from anywhere else. He might say that in such and such country, that particular radio he got cheaper, but a reasoning can always be given to him as to why we are slightly costlier.

- On page 16 of the Consultation Document it is mentioned "There will be no limitations placed on the **number of importers** or on the type of equipment imported and supplied..." is also NOT acceptable by us. That means, if we are a Motorola Distributor and we have got the Type Approval for a particular model of radio and this Type Approval is also mentioned in TR (Type Approval Register) available at Customs at Doha Airport, any other importer can get the same model from anywhere else !!!. This will not be good in the business interests of Qatar as well as in the business interests of companies in Qatar mainly owned and sponsored by Qataris. This will be a loss to local businessmen because many companies (or individuals) will import the RTTE equipment from abroad directly due to which there will be no benefit to the local businessmen. Here the question comes : if they are allowed to import the RTTE equipment from abroad on their own then why there should be a local distributor ?.

- The sentence on page 16 of the Consultation Document stating "This replaces the current authorization approach (**Dealer's License**) which is applied prior to the implementation of the new regime" is also not acceptable. The importation should always be through the Dealer.

- Figure 2 : RTTE Importation Process (please refer page 17 of Consultation Document). This flow chart also needs to be amended. Let us start from the top :-

  (a) "One of the following parties wishes to import RTTE : Persons wishing to import RTTE for their own use" should be deleted because all the importation should be through the dealer.

  (b) "RTTE already type approved by ictQATAR ? If Yes then Licence-Free Radio Equipment ?. if no then Licenced Radio Equipment then The importer must obtain customs clearance from ictQatar issued upon submission of valid licences to own and Operate the equipment" should be amended to read " Contact Local Distributor for importing the RTTE equipment". Similarly, "Licenced-Free Radio Equipment" should also be deleted. All the equipment should be imported by the local distributor.

**Question 11** : Is there any specific information that should also be included in these registers ?.

**Answer 11** : Please refer page 18 of the Consultation Document. Instead of having two registers, there should be only one register "TA Register" in which in addition to the type of RTTE, Manufacturer, Model number, whether or not the Radio equipment requires a licence from ictQATAR, the details like Company name, Commercial Registration Number and address and contact information should also be included so that in one go, all the information is available.

**Question 12** : ictQATAR invites comments about the proposed policy for customs clearance.

**Answer 12** : Unlicenced RTTE particularly any Licence-Free radio (or anything which has RF radiation) should not be allowed without Import Permission from ictQatar that too

through the dealer. The reason for this is that such Licence-Free radios might not meet the required standards of EMI (Electro Magnetic Induction) or EMC (Electromagnetic Compatibility). Although these radios may be on some fixed frequency, but the harmonics can always affect other equipment. Not only this, someone may import these radios for their own use but it may be used for commercial purposes or for any of those purposes for which these Licence-Free radios may not be permitted and it would be very difficult to check them.

**Question 13** : ictQATAR invites comments about the proposed policy for selling RTTE in Qatar.

**Answer 13** : Please refer page 19 of the Consultation Document. The sentence "This means that the current Dealer's License from ictQATAR will no longer be required to sell RTTE in Qatar" is really very objectionable. With great difficulty, we (any company in Qatar owned by a Qatari citizen) gets distributorship or dealership of some renowned manufacturer or suppliers in the world and without any consideration to this, anyone else can be allowed to import those equipment in Qatar !!!. As mentioned earlier, the importation should be only through the dealers and dealer should have a proper dealership certificate from ictQATAR.

**Question 14** : Are there any specific comments or issues regarding the proposed marking and labelling policy ?.

**Answer 14** : Yes, it is a good idea to put the label of ictQATAR for the "Standard Type Approval Process" equipment. But later as the time passes, customers and people will keep thinking that there is no label on "Simplified Type Approval Process" equipment, hence that particular equipment is no good. An example of this is that we have been selling a particular brand of radio since last more than 10 years. One of the oil companies has already been using that model of the radios, through one of its tenders wanted to know whether that model is Type Approved or not. If that company was going to use this model for the first time, then there was no problem. But in spite of using these radios since last many years, they ask again if the radio has been Type approved or not. The customers and public in general forget about these things and they will expect that every model of the RTTE equipment should have the label. Hence, either all the equipment should have the label of ictQATAR or they should not have any labels. However, if there is a choice, we would recommend that ALL the RTTE equipment should have the label of ictQATAR so that the customer will have confidence that he is buying a genuine thing.

**Question 15** : Do you support this market surveillance and enforcement policy for RTTE ?. Are there any specific suggestions in this regard ?.

**Answer 15** : Yes, we fully support this market surveillance policy for RTTE. But the main issues are as follows :-

- Already in Qatar many unauthorised and non-type approved radios are being used. How ictQATAR is going to check them ?. There should be a method to check them.

- In spite of the enforcement of market surveillance policy, let us be frank about it, unauthorised and non-type approved radios will still keep coming into Qatar. Doha International Airport is getting crowded more and more and more and more passengers are coming every day at Doha Airport and Customs Authorities cannot check each and every baggage of the passengers for checking whether they are carrying any radios or not. The X-Ray system at the Airport is very advanced and good system but still these unauthorised and non-type approved radios may slip into Qatar. For this we cannot blame Customs Authorities at the Airport.

- Many unauthorized frequencies are being used. These radios are already programmed out of Qatar and brought here.

- Our suggestion in this regard is that a full-fledged RF frequency monitoring system should be placed in many areas in Qatar so that ictQATAR will immediately come to know who are using the un-authorised radios.

**Question 16** : Are there any specific issues that should be addressed at this stage to ensure a proper transition from the current Type Approval Regime to the new one ?.

**Answer 16** : We agree with the provisions.

**Question 17** : Are there any other subjects or issues that should be addressed in the Type Approval Policy ?.

**Answer 17** :      * Please refer **page 22** of the Consultation Documents. Item 2 "Who can apply for TA". In the Proposed Type Approval Regime, "d) Companies wishing to import RTTE for their own internal use" should be deleted. The Current Type Approval Regime should continue in this regard.

- **Item 3** "When is TA necessary – how many times should TA be performed for the same type of equipment". The Current Type Approval Regime should continue and in addition the "TA Register" on the website will show the RTTE that is already type-approved by ictQATAR.

- **Item 5** "TA application requirements". For the Simplified Type Approval Process, requirement of submitting Type Approval Certificate issued by an accredited laboratory or a Type Approval body recognized by ictQATAR certifying the compliance of the equipment with specific technical standards should NOT be mandatory. At the time of applying for Type Approval, we always attach the brochure and if the brochure mentions FCC or CE or ETSI etc, it should be considered as compliant. Also, a copy of warranty document is not required because we always mention warranty at the time of offering the radios to the customers.

- **Item 10** (page 24 of the Consultation Document) : " Who can import RTTE (that has already been type-approved by ictQATAR)". The sentence c) Persons (individuals or companies) can import RTTE for their own use.... should be

deleted. All imports should be through the Authorized Distributor/Dealer. Also "NB : The current Dealer's Licence will cease to exist" should be deleted. The dealers should have the Dealer Certificate and only through them the RTTE should be imported.

- **Item 11** : Customs Clearance : In the Proposed Type Approval Regime, Customs Clearance from ictQATAR should be a MUST for any RTTE equipment which radiates RF signals whether it is licensed or Licence-Free. In any case Licence-Free (particularly anything which radiates RF signals should not be allowed.

- **Item 13** (page 24 of the Consultation Document) : Marking Requirements : In the Proposed Type Approval Regime, either ALL equipments (Simplified Type Approval equipment or Standard Type Approval equipment) should have the marking or ALL should not have a marking. It is recommended to have the marking in ALL the equipment to generate confidence in the customers that they are buying genuine things.

Thanks and regards      **Our Contact Details** :-
           Tel : 4478435, 4478437
           Fax : 4478059
           Mob : 5537647
A.K. Pandey            Email : eastech@qatar.net.qa    or
Marketing Manager                  akpandey98@qatar.net.qa

# **Fujitsu**


1. National or international accredited laboratories or recognized Type Approval bodies
 - We would like you to clarify practical names of these parties.
 - We would like you to accept the following laboratories too.
   Laboratories which hold the ISO17025 certification or belong to the ILAC.
 - We would like you to also accept such parties not only in EU or USA but also in other countries.

2. Engineering change after type-approval
 - we would like you to clarify border of necessity like below.
   Example
   Re-type-approval NOT required
     Changes NOT affect to radio characteristics
       ex. Colour, external design, ...
   Re-type-approval required
     Changes affect to radio characteristics

3. Warranty documents
   For vehicle installed radio devices, we would like you to exempt from this requirement.
   Because of the following reasons;
   - Warranty documents of individual devices do not exist.
   - We recognize that no other countries have taken place the request.

4. Technical standards
   We would like you to clarify practical names of such standards that ictQATAR recognizes.

5. Application procedure
   We would like you to request to clarify issuing schedule of application procedure and requirements.

6. Label
   We would like you to clarify specific size of the label.

7. Licensing
   We would like you to exempt all vehicle installed devices from licensing.
   Because it is not practical that all of drivers of a vehicle have to get such kind of license.

8. Others
   We believe that this new scheme is beneficial to all of seller, importer, user of an equipment.
   We expect the earlier implementation.
   We also expect that as start of the new scheme, announce in advance and adequate preparations by ictQATAR.

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Hiroshi (Hank) Uda
Homologation Team, Engineering Administration Department,
Fujitsu Ten Limited.
Phone: 81-78-682-2159  Facsimile: 81-78-671-7160
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# **International Compliance Management**

Dear Sir-Madam,

I am writing to inform you that I have read the new proposed type approval application procedures and can say that it is a refreshing and forwarding thinking approach of ictQATAR to look at simplifying the regulator procedure whilst maintaining integrity and quality assurance.

I very much like the proposed procedure and welcome the new approach. I have no additional comments to add to the proposals.

With kind regards

Mark Boughen
I.C.M Director
International Compliance Management
24 Littondale, Lowerdale,
Elloughton
East Yorkshire
UK
HU15 1FB
Tel: +44 (0)1482 669 770
Fax : +44 1302 607 449
e-mail: info@internationalcompliancemanagement.com
e-mail :markb@internationalcompliancemanagement.com

# Response to ictQATAR from Pacific Industrial - Japan

| No. | Our requests to ict QATAR |
|-----|---------------------------|
| 1 | ●About accredited laboratories / recognized Type Approval bodies.<br>＊We want you to make the accredited laboratories / recognized Type Approval bodies clear.<br>＊We want you to make be able to recognize as accredited laboratories by not only the accredited laboratories but also organization that have ISO 17025 or ILAC member.<br>＊We want you to recognize some oganization as Type Approval bodies too. (Not only for U.S.A. and Europe countries) |
| 2 | ●About dealing at the time of the change after approveing our product.<br>＊I want you to make the criterion that we need or not to re-apply new approval clear.<br>[Example]<br>NOT NEED:The case of that a radio characteristic is not changed.<br>　　　　　(Changing the shape, color, etc. )<br>NEED:The case of that a radio characteristic is changed. |
| 3 | ●About Warranty document<br>＊ I want you to except the requirement of submit the copy of warranty document. Because, in parts of car, warranty document don't require in other country, so not exist it. |
| 4 | ●About technical standard<br>＊I want you to make the standard that ictQATAR recognize clear. |
| 5 | ●About an application procedure document.<br>＊I want you to make it clear when an application procedure document publish. |
| 6 | ●About a label<br>＊I want you to make the concrete measurement of the label clear. |
| 7 | ●About a license<br>＊If we need License in parts of car, we want you not to need the license in all parts.<br>　Because, it is inconsistent with reality that the custmer who purchase car must get licenses. |
| 8 | ●Others<br>＊We think the New system is useful for equipment of dealer, importer, user. We expect you to introdure it early. In addition, we expect for ictQATAR to preparate enough at the New system starting. |

# Panasonic Corporation

Regulatory Authority

The Supreme Council of Information and Communication Technology (ictQATAR)

Mr. Ahmad Sultan

Al Nasr Tower, 19th Floor

Corniche Road, P.O.Box: 23264

Doha, Qatar


Dear   Sir.


We, this time, verify " TYPE APPROVAL POLICY For Radio Equipment and Telecommunications Terminal Equipment （Consultation Document）" collection and present the comment below.


    Comment:

    1. We would like you to clarify on <u>what conditions</u> will re-approval be required for Modification equipment or Improvement equipment.

    **2.** We have not issued such written guarantee for automotive equipment in any other country.

      Moreover, we have no written guarantees of individual parts.

      Therefore, we would like to be exempted from this.

    3. We would like you to clarify ictQATAR Specification.

    4. We would like you to clarify details of Type Approval process.

    5. We would like you to clarify details of Marking and Labeling.


As mentioned above, you inquire and please adopt it as a formal regulation collection.


Best regards,

Hiroshi Tajima

Technology Management Center

Automotive Systems Company

**Panasonic Corporation**

# PIONEER CORPORATION

Regulatory Authority
The Supreme Council of Information and Communication Technology (ictQATAR
Mr. Ahmad Sultan


Dear Mr. Sultan,

We, Pioneer Corporation, would like to respond toward your public consultation of "Type Approval Policy for RTTE" as below.
We would like to ask you to take our response into your consideration to make your final regulation.


For Question 4:
   We would like to ask you (ictQATAR) to clarify "accredited laboratories" and "recognized Type Approval bodies", which are described in 4.2.1., such as but not limited to definition, description and/or list on your website.
   Here, we also would like to ask you to accept and recognize the reports prepared by laboratories who have been ISO17025 accredited and ILAC members as well.

For Question 7:
   We would like to ask you (ictQATAR) to clarify "the recognized standards" which is described in 4.3. such as but not limited to definition, description and/or list on your website.

For Question 8:
   We would like to ask you (ictQATAR) to clarify "the same technical specifications" which is described in 4.4. In other words, we would like to ask you (ictQATAR) to provide criteria of which occasion of change in specification you recognize not same specifications, which we (manufacturers) need to make new (or revised) application.

For Question 13:
   We would like to ask you (ictQATAR) to accept the condition where warranty document for the equipment specific is not provided.
   In other words, we would like to ask you (ictQATAR) to accept the case where warranty document for whole system is provided, but no equipment specific one is provided.
   Typical example for the case is like "Warranty document for car is provided which covers all equipments install on the car."

For Question 17 (Overall):
   Since we believe that this new Policy is valuable and welcomed by all parties including manufacturers, importers and end users, we hope that you (ictQATAR) will finalized and make effective this policy soon.
   We also would like to ask you (ictQATAR) to keep us informed, especially for its introduction

schedule, and expect your preparation for new procedure.


We thank you for your consideration in advance and best regards,

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*
 MASAHIRO SATO
  PIONEER CORPORATION
   EMC Laboratory, Kawagoe Plant

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\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

**ictQATAR Consultation Document:**

**Type Approval Policy for Radio Equipment and**

**Telecommunications Terminal Equipment**

**Dated 26 April 2009**

**Submission by Qatar Telecommunications (Qtel) QSC**

Ref: Qtel/GS/Reg-536/2009-05
Date: 28th May 09

Mr. Ahmad Sultan
Licensing Section Manager
Policy and Economic Affairs Department
Regulatory Authority
The Supreme Council of Information and Communication Technology ictQATAR
email: consult@ict.gov.qa

**Dear Ahmad**

**Subject: Consultation on Type Approval Policy**

Qatar Telecom, Qtel, is pleased to present its views and comments on this proposed Type Approval Policy for Radio Equipment and Telecommunications Terminal Equipment, RTTE.

We wish to thank ictQATAR for initiating this public consultation to improve the current approval regime and ultimately to facilitate competition in the supply and choice of RTTE in the State of Qatar for the benefits of all customers, please find hereafter Qtel's response. Please find hereafter Qtel response.

Yours sincerely,

Yousuf Abdulla Al Kubaisi
Divisional Manager, Regulatory Management

**Introduction**

Qtel appreciates the opportunity to provide its input and views regarding type approval policy for radio equipment and telecommunications terminal equipment ("RTTE"), the Consultation Document. Qtel views the oversight and proper approval of RTTE to be one of ictQATAR's most important regulatory functions. Ensuring that telecommunications terminal equipment poses no harm to telecommunications networks, equipment or facilities or constitute public hazard and that radio equipment does not cause harmful interference to other radio equipment, all of which is critical to the success of the telecommunications industry and to ensuring high quality services are delivered to consumers at all times. Qtel supports ictQATAR's effort to reform and streamline the process for type approval of RTTE. We believe, however that the process outlined in the consultation document requires greater specificity and detail before it can be successfully implemented by ictQATAR.

## 1. General Comments

Qtel provides specific response to the questions posed in the consultation document below but also has a number of general comments regarding the process outlined in the consultation document.

First, Qtel believes that ictQATAR should refine its rule-making process to give stakeholders and members of the public a clear idea of how and when its decisions will be made and how input can be provided into ictQATAR's processes. For example, the consultation document is entitled a "policy" and yet proposes a set of detailed procedures. At the same time, it mentions a set of guidelines and procedures to be developed by ictQATAR in the future. Qtel believes that it would benefit both stakeholders and ictQATAR if there were greater clarity regarding the process ictQATAR intends to follow in developing new regulations, policies and procedures that will impact the industry. A standardized approach to developing new rules will create greater certainty and predictability for both stakeholders and ictQATAR and encourage high-quality input and feedback from stakeholders at each step.

Second, Qtel is concerned that the existing process outlined in the consultation document differs considerably from the process currently undertaken by Qtel in seeking equipment type approval from ictQATAR. In particular, the process outlined in the consultation document states that applicants are not required to supply sample equipment, while it is Qtel's experience that ictQATAR routinely requests such sample equipment. Moreover, the consultation document states that applicant should provide type-approval certificates, but it is Qtel's experience that such certificates are not required. Qtel is concerned that without a thorough understanding of the existing process and without precisely reflecting the existing requirements by ictQATAR into this consultation document, it will be difficult to arrive at a clear understanding of how the process should be reformed.

## 2.  Objectives:

The Consultation document identifies several objectives of the proposed new type approval program.  In general, these are aimed at removing unnecessary restrictions and improving the efficiency of the existing regime for importers and dealers while at the same time maintaining the integrity of the process to ensure that only equipment that complies with appropriate technical standards, qualifies for importation into and use in Qatar.

> *Question 1: ictQATAR invites comments about the scope and objectives of the proposed Type Approval Policy.*

Qtel supports ictQATAR in undertaking this review of its type approval standards and processes.  There is tension, however between ictQATAR's objectives aimed at streamlining and simplifying the process and the need to maintain proper oversight such that appropriate standards are followed and only compliant equipment is imported and used in Qatar.  The use of unauthorized RTTE in Qatar can cause a significant negative impact on the services provided by licensed operators.  This is particularly the case with respect to non-compliant radio equipment, which has the potential to create harmful interference with licensed operator's GSM and other radio-frequency-based services.  In addition, non-compliant GSM handsets and fixed terminal equipment have the potential to result in sub-optimal quality of service, the cause of which may not be readily apparent to the user and which may result in a false impression of poor quality of service offered by licensed operators (and yet which in such cases is beyond their control and is difficult to identify and resolve).  Qtel urges ictQATAR to maintain a high priority on ensuring that only appropriate equipment may be imported into and used in Qatar and that the general public is made aware of these facts.

## 3.  Parties allowed to import/sell type-approved equipment

Under the existing type approval process, only telecommunications operators and dealers licensed by ictQATAR are allowed to import telecommunications equipment into Qatar.  The consultation document proposes to eliminate the "dealer's license" and to allow importation of previously approved equipment by the following parties:  local and international manufacturers, licensed operators (which are defined as operators licensed by ictQATAR to own, establish and operate a telecommunications network), companies in Qatar wishing to import RTTE for their own use, and other "authorized importers" determined by ictQATAR.

> *Question 2: ictQATAR seeks views on the proposed parties that can apply for Type Approval.*

Qtel believes that the four categories of importers identified in the consultation document are appropriate, but that a differentiation needs to be made in the equipment that different importers are allowed to import.  For example, companies

importing equipment for their own use should not be allowed to import licensed radio equipment or other equipment inappropriate for an end-user or intended to bypass the interconnection link between licensed operators or conduct illegal activities. Furthermore, the "authorized importer" definition is a fundamental element of ictQATAR's proposed new policy and needs to be clearly defined in the context of this consultation. Qtel believes that such importers should meet specific pre-determined criteria, such as having an established, authorized relationship with a particular manufacturer (or their agent) and the ability to provide full warranty services for the products it sells in Qatar.

Qtel faces a major problem of grey market GSM handsets, which are imported into Qatar by small traders and sold on the market with faulty configuration settings or configured for foreign networks. Such handsets require reconfiguration and reprogramming in order to be used and fully functions on the Qtel network. Often it is up to Qtel to perform such configuration or to spend considerable resources in assisting the customer to do so. In Qtel's view, such "grey market" handsets should be prohibited in Qatar and sales of GSM handsets should be allowed only by authorized dealers that are required to ensure that only handsets properly configured to work in Qatar are sold, and that all dealers are required to provide warranty and technical support for handsets that they sell.

> **Question 3: Do you have any comments about the proposal that once a type of RTTE is approved by ictQATAR, any eligible importer can import the same type of RTTE?**

As discussed above, Qtel believes that there need to be different rules applied for the import and sale of different types of equipment. In particular, only holders of valid radio spectrum and operating licenses should be authorized to use "licensed radio equipment". While it could be permissible to allow authorized dealers to import such equipment, ictQATAR must put in place effective safeguards to ensure that such equipment is sold to and used by only those entities that possess the required radio spectrum and operating licenses. Moreover, importation of equipment for a party's own use should be limited to terminal/network and unlicensed radio equipment suitable for subscriber use and not telecom network equipment or radio equipment requiring a license.

## 4. Proposed type approval process

The consultation document proposes to introduce a type approval process that would apply differently based on whether the equipment in question had already been "type-approved by national or international accredited laboratories or recognized type approval bodies". If so, a simplified type-approval process would apply.

If the applicant cannot demonstrate such approval, the standard type approval process would apply. That process would require the applicant to supply test

reports from "testing or measurement bodies or agencies officially recognized by ictQATAR" that demonstrate that the equipment complies with technical standards that are recognized by ictQATAR.

### *Question 4: Do you have any comments about the Simplified Type Approval Process. In particular, are there any other requirements that should be submitted with the Type Approval application?*

The consultation proposes that ictQATAR would recognize type approval by an "accredited laboratory or recognized type-approval body". Qtel views the identification of such entities as a critical element of ictQATAR's type-approval policy. The specific criteria ictQATAR will use to determine which bodies qualify as "recognized" or "accredited" should be the subject of further consultation with the industry and other stakeholders.

In addition, based on Qtel's understanding of the common practice in other countries, "laboratories" do not undertake type-approvals, but rather only certify compliance with technical standards. ictQATAR should clarify this distinction. In Qtel's view, only such equipment that has been type approved in another country according to a set of specifications recognized by ictQATAR should be subject to the simplified process. Equipment that is merely certified as compliant with a recognized technical standard by a testing laboratory should be subject to the standard type approval process. Such process would then entail ictQATAR verifying that the testing results conform to the recognized specifications approved in advance by ictQATAR.

It is critical, however, that ictQATAR develop and publish a comprehensive list of approved specifications and recognized type-approval bodies whose certification would be valid as a part of this process.

### *Question 5: Do you have any comments about the Standard Type Approval Process. In particular, are there any other requirements that should be submitted with the Type Approval application?*

The consultation proposes that applicants submit test reports developed by "recognized testing and measurement bodies" officially recognized by ictQATAR demonstrating compliance with "technical standards that are recognized by ictQATAR."

Qtel believes that the qualification criteria for and specific identities of such testing and measurement bodies are of critical importance to the success of ictQATAR's proposed new process and needs to be the subject of further consultation and discussion between the industry and ictQATAR. For the same reasons, there needs to be visibility and participation with stakeholders in the specification of the technical standards to be recognized by ictQATAR. At a minimum, ictQATAR should develop a set of qualifying criteria according to a transparent process and allow

parties to provide input on the issues of whether recognition is appropriate for a particular testing and measurement body or a given technical standard.

### Question 6: Do you have any comments about having two Type Approval processes?

Qtel supports having two processes and believes that, if implemented properly, the proposed processes would meet ictQATAR's proposed objectives of streamlining the existing processes while still safeguarding the integrity of the type approval process. The success of this effort, however will depend on the specific entities whose type approval decisions will be adopted, the applicable technical standards that will be approved and the testing and measurement bodies whose certifications will be recognized by ictQATAR. As discussed above, it is critical to the success of this effort that appropriate care is taken in selecting such entities and standards.

### Question 7: Are there any particular criteria or issues that ictQATAR should take into consideration in determining the recognized standards?

The recognized standards must be well- established standards that ensure appropriate compliance with technical compatibility requirements, health and safety safeguards and radio interference limitations. Qtel suggests that ictQATAR draw on established standards and specifications developed by European, US, Japanese and other recognized type-approval bodies.

### Question 8: Do you have any comments about the validity period of Type Approvals?

Qtel notes the proposal for unlimited type approval periods. Qtel would suggest, however, that there needs to be a procedural mechanism for removing specific types of equipment from the approved list if technical standards change or product defects become known. Moreover, in light of the changing nature of technology and resulting standards and rapid obsolescence of RTTE, Qtel suggests that ictQATAR consider a limitation of 5 years renewable, depending on the various equipments in order to prevent the import of obsolete equipment into Qatar.

### Question 9: Are there any comments about the proposed fees?

Qtel has no comment on the proposed fees.

## 5. Importation requirements

The consultation document proposes that any of the entities discussed in section 3 should be authorized to import any equipment that is on a list of previously type-approved equipment, and that the current "dealer's license" should be eliminated.

*Question 10: Are there any comments about the proposed importation process? In particular, do you support the proposal that an Authorized Importer can import any RTTE (from any brands) that (i) has been type-approved by ictQATAR and (ii) contains a valid warranty for customers in Qatar?*

As discussed above in response to question 2, Qtel believes that appropriate safeguards need to be in place, particularly with respect to licensed radio equipment, to ensure that only those entities with appropriate authorization are able to use such equipment in Qatar. ictQATAR needs to ensure that only licensed operators or dealers acting on behalf of such operators are authorized to import such equipment. In addition, Qtel reiterates its concern about the proliferation of "grey market" devices in Qatar with improper configurations and often foreign branding. Qtel believes that ictQATAR need to maintain oversight over such activities and not simply allow anyone to import and sell RTTE.

Moreover, ictQATAR would need to ensure that imported equipment conforms exactly to the type-approval certification, as many manufacturers produce a variety of similar models with slightly different operating frequencies, power levels and configuration details.

*Question 11: Is there any specific information that should also be included in these registers?*

Qtel proposes to include in the type approval register the validity of the type approval granted and for each RTTE. Both registers should be regularly updated and be made available with minimum transitional time that should be identified.

To ensure full compliance, specific information may need to be included such as: operating frequency, frequency band, RF power.

*Question 12: ictQATAR invites comments about the proposed policy for customs clearance.*

Qtel supports the proposal that ictQATAR maintain oversight over the customs approval process for licensed radio equipment in order to ensure that only authorized entities have access to such equipment.

## 6. Sales Requirements

The consultation document proposes to allow any entity to sell RTTE in Qatar as long as the equipment is acquired from an importer authorized by ictQATAR and includes a warranty valid for a minimum of 12 months. All authorized importers and licensed operators would be required to keep a record of equipment retailers

and/or wholesalers and equipment sold to them in order to facilitate market surveillance activities of ictQATAR.

> *Question 13: ictQATAR invites comments about the proposed policy for selling RTTE in Qatar.*

Qtel believes that ictQATAR's new policy would only be workable if ictQATAR is vigilant and have the capability to deploy the required resources and take necessary enforcement actions swiftly to ensure that only type-approved equipment is sold in Qatar and that only those entities with the appropriate manufacturer relationships and warranty support capabilities are allowed to sell RTTE in Qatar. In addition, ictQATAR must ensure that licensed radio equipment is not made available to any persons who do not hold valid radio frequency licenses.

> *Question 14: Are there any specific comments or issues regarding the proposed marking and labeling policy?*

Qtel supports the proposed marking policy, but submits that a list of approved marks should be established by ictQATAR as soon as practicable.

> *Question 15: Do you support this market surveillance and enforcement policy for RTTE? Are there any specific suggestions in this regard?*

Qtel supports ictQATAR's efforts to ensure compliance with its new equipment type approval approach and urges ictQATAR to take all necessary steps to ensure that no-compliant equipment is not used in Qatar. Qtel suggests that ictQATAR initiate spot checks and surprise inspections of authorized dealers and other sellers of RTTE in Qatar. In addition, ictQATAR must take measures to ensure that equipment sold in Qatar is identical to the equipment that has been type approved. Spot checks or other measures should be undertaken to ensure that this is the case and that the general public is made aware of the outcome of ictQATAR actions in this matter.

## 7. Other Issues

> *Question 16: Are there any specific issues that should be addressed at this stage to ensure a proper transition from the current Type Approval Regime to the new one?*

Under the current approach, any entity that seeks to export radio equipment from Qatar to another country must have a dealer's license. Removing this licensing element has the potential to promote further grey/black market activity that has the potential to harm existing relationships between Qatari businesses and established manufacturers and distributors outside Qatar. Qtel suggests that ictQATAR limit the export of RTTE from Qatar to other countries, as unauthorized trading in RTTE has the potential to harm existing legitimate dealer relationships and further fuel grey market activity in Qatar.

**Question 17: Are there any other subjects or issues that should be addressed in the Type Approval Policy?**

Qtel believes that effective enforcement of its type-approval regime is critical to its success. Qtel would urge ictQATAR to ensure that its efforts to streamline these procedures do not result in a loosening or relaxing of standards that would allow illegitimate equipment to be imported and used in Qatar or permits public false perception of the ictQATAR intentions.

In addition, Qtel believes that an information campaign should be undertaken by ictQATAR to ensure that the public is aware of type approval issues. Some dealers may not be informed about the policy to be applied to import or export telecommunications equipment. Moreover, as regards the transition to the new type approval process, interested parties already registered by IctQATAR should be informed in written and through the media by IctQATAR in advance of implementing this regime. The general public should also be made aware of the type approval register (TA Register) to ensure that individual new equipment they choose to bring into Qatar complies with the type approved equipment.

# Comments.

**Q1. ictQatar invites comments about the scope and objective of the proposed type approval**

The scope and the objective of the proposed type approval is satisfactory

**Q2.ictQatar seeks views on the proposed parties that can apply for type approval**

Qsat believes that will be better if the authorized importer or licensed operator only apply for the type approval. This will avoid the confusion for multiple applications for the same products for type approval. Also it should be allowed for companies to import RTTE for there own use only if there are no authorized importer for this RTTE at Qatar

**Q3.Do you have any comments about the proposal that once a type approval of RTTE approved by ictQatar, any eligible importer can import the same type of RTTE?**

This approach is satisfactory.

**Q4.Do you have any comments about the simplified type approval process, in particular are they any other requirements that should be submitted with the type approval application?**

Qsat welcomes this move and the documents requested for this is adequate.

**Q5. Do you have any comments about the standard type approval process; in particular are they any other requirements that should be submitted with the type approval application?**

The standard type approval is satisfactory

**Q6.Do you have any comments having two type approval processes?**

This will provide ease in approval process

**Q7.Are they any particular criteria or issues that ictQatar should take in to consideration in determining the recognized standard?**

There are no such issues

**Q8.Do you have any comments on the validity period of the type approval?**

The life time validity is satisfactory.

**Q9 Are there any comments about the proposed fees?**

The fees structure is acceptable

**Q10. Are they any comments about the proposed importation process? In particular, do u support the proposal that an authorized importer can import any RTTE(from any brands) that (i) Has been type approved by ictQatar and (ii) contains a valid warranty for customers in Qatar?**

The proposal for any authorized importer to import RTTE approved by ictQatar is also satisfactory but Qsat feels that the warranty period should not be specified by ictQatar rather allow the supplier to provide particular warranty period to customer

**Q11. Is there any specific information that should also be included in these register?**

For the TA register, it can include brand name, country of origin and authorized importer.

**Q12.ictQatar invites comments about the proposed policy for customs clearance.**

The proposed policy is of use since it provides live information about the type approvals and authorized importers to customs. This will reduce the physical exertion of customs clearance

**Q13.ictQatar invites comments about the proposed policy for selling RTTE in Qatar.**

This policy is satisfactory.

**Q14. Are they any specific comments or issues regarding the proposed marking and labeling policy?**

The labeling policy for standard type approval process is acceptable

**Q15.Do you support this market surveillance and enforcement policy for RTTE? Are they any specific suggestions in this regard?**

This enforcement policy is satisfactory.

**Q16. Are there any specific issues that should be addressed at this stage to ensure a proper transition from the current type approval regime to the new one?**

There are no specific issues that need to be addressed at this stage.

**Q17.Are they any other subjects or issues that should be addressed in the type approval policy?**

Qsat has this concern
a) There will be a product in same model or series from the same manufacturer with different features, any such particular models require separate type approval for each one.

---------------------------------------------------------

We are happy to discuss these comments in detail with ictQatar. Please do let us know of a convenient time for this discussion. Kindly inform us, if you need any further clarification or for further information.

Thanks and Regards.

Ali.A..Hadi

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## Question Page

**QUESTION 1:**
ICTQATAR INVITES COMMENTS ABOUT THE SCOPE AND OBJECTIVES OF THE PROPOSED
TYPE APPROVAL POLICY. .......... 5

Answer 1:
RigNet welcomes the move from ICT-Qatar for the setup of clear guidelines and policies for the type
approval and the proper importation of RTTE. Such a system has been long awaited and will eliminate
the ambiguity when importing RTTE and will assist in streamlined delivery of telecommunication
services to the users in the state of Qatar.

**QUESTION 2:**
ICT QATAR SEEKS VIEWS ON THE PROPOSED PARTIES THAT CAN APPLY FOR TYPE
APPROVAL. .................................. 11

Answer 2:
RigNet agrees with the proposed type approval party criteria and believes that open importation of
RTTE through other means should be heavily discouraged. RigNet does however wish to express a
strong desire that ictQatar accepts spare parts through this process and provides ease-of-operation to
local resellers for them to stock critical components inside the state of Qatar. RigNet also believes that
type approval and the importation should be primarily through, but not limited to, local dealers in order
to encourage stocking and local warranty replacement of the equipment.

**QUESTION 3:**
DO YOU HAVE ANY COMMENTS ABOUT THE PROPOSAL THAT ONCE A TYPE OF RTTE IS
APPROVED BY ICTQATAR, ANY ELIGIBLE IMPORTER CAN IMPORT THE SAME TYPE OF
RTTE? ......................................................................... 11
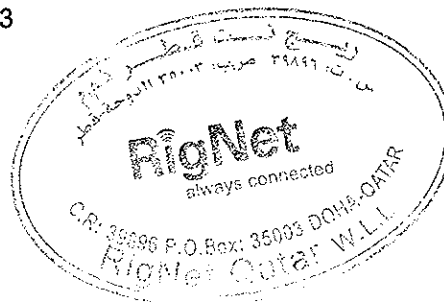
Answer 3:
RigNet agrees with the above mentioned proposal but recognizes this as an imperfect system since
the first company or individual gaining type approval paid for all subsequent approvals. RigNet
suggest that type approval fees be waived or a portion refunded at completion of approval to make it
fair.

**QUESTION 4:**
DO YOU HAVE ANY COMMENTS ABOUT THE SIMPLIFIED TYPE APPROVAL PROCESS. IN
PARTICULAR, ARE THERE ANY OTHER REQUIREMENTS THAT SHOULD BE SUBMITTED WITH
THE TYPE APPROVAL APPLICATION? ............................ 13

Answer 4 :
RigNet agrees with the proposed process.

**RigNet**
always connected.

**QUESTION 5:**
DO YOU HAVE ANY COMMENTS ABOUT THE STANDARD TYPE APPROVAL PROCESS. IN
PARTICULAR, ARE THERE ANY OTHER REQUIREMENTS THAT SHOULD BE SUBMITTED WITH
THE TYPE APPROVAL APPLICATION? ...................................... 14

**Answer 5 :**
RigNet believes that under the managed communication services, service warranty of a specific
product will be covered under customer SLA or customer contract and therefore may be irrelevant for
individual products.

**QUESTION 6:**

DO YOU HAVE ANY COMMENTS ABOUT HAVING TWO TYPE APPROVAL PROCESSES?
............................................. 14

**Answer 6 :**
RigNet welcomes any means that will expedite the type approval process and salutes efforts to avoid
delay with the importation of products and delivery of services.

**QUESTION 7:**

ARE THERE ANY PARTICULAR CRITERIA OR ISSUES THAT ICTQATAR SHOULD TAKE INTO
CONSIDERATION IN DETERMINING THE RECOGNIZED STANDARDS?
............................................................................................... 15

**Answer 7 :**
ICTQatar is encouraged to look at the broader range of standards that may not be related to just the
technical specifications; i.e. Intrinsically safe, corrosion resistant, adverse weather resistant, and other
special criteria for operations in the Gulf region. It is suggested that these not have to undergo a
separate type approval process.

**QUESTION 8:**
DO YOU HAVE ANY COMMENTS ABOUT THE VALIDITY PERIOD OF TYPE APPROVALS?
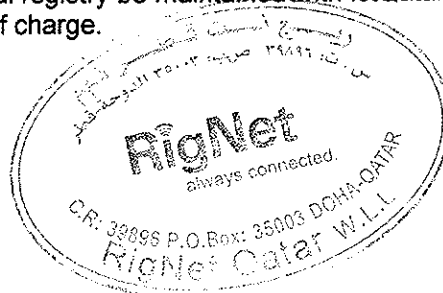............................................. 15

**Answer 8 :**
 RigNet agrees with the validity period.

**QUESTION 9:**
ARE THERE ANY COMMENTS ABOUT THE PROPOSED FEES?
.................................................................... 16 QUESTION

**Answer 9 :**
No Comment on charges proposed but request that a approval registry be maintained with ictQatar
where applicants can retrieve previous approval copies free of charge.

# RigNet
always connected.

**QUESTION 10:**
ARE THERE ANY COMMENTS ABOUT THE PROPOSED IMPORTATION PROCESS? IN
PARTICULAR, DO YOU SUPPORT THE PROPOSAL THAT AN AUTHORIZED IMPORTER CAN
IMPORT ANY RTTE (FROM ANY BRANDS) THAT (I) HAS BEEN TYPE-APPROVED BY ICTQATAR
AND (II) CONTAINS A VALID WARRANTY FOR CUSTOMERS IN QATAR? ............................ 17

<u>Answer 10 :</u>
RigNet has no objection to end users importing personal equipments such as mobile phones,
personal computers ... etc, but feels open import of certain RTTE such as Radio, Microwave, VSAT
equipment should be restricted to authorized parties.

**QUESTION 11:**
IS THERE ANY SPECIFIC INFORMATION THAT SHOULD ALSO BE INCLUDED IN THESE
REGISTERS? ............................ 18

<u>Answer 11 :</u>
RigNet agrees with the list of required information to be included in the register

**QUESTION 12:**
ICTQATAR INVITES COMMENTS ABOUT THE PROPOSED POLICY FOR CUSTOMS
CLEARANCE. ................................ 19

<u>Answer 12 :</u>
RigNet agrees with what is stipulated in the proposed Custom clearance formalities.

**QUESTION 13:**
ICTQATAR INVITES COMMENTS ABOUT THE PROPOSED POLICY FOR SELLING RTTE IN
QATAR. ............................ 19

<u>Answer 13</u> :
RigNet has no objection to allowing resale of RTTE but believes that under the managed
communication services, service warranty of a specific product will be covered under customer SLA or
customer contract and therefore may be irrelevant for individual products.

**QUESTION 14:**
ARE THERE ANY SPECIFIC COMMENTS OR ISSUES REGARDING THE PROPOSED MARKING
AND LABELING POLICY? ........ 20

<u>Answer 14</u> :
RigNet agrees with the proposed marking and labeling process and makes the recommendation of a
permanent fixture that is suitable for the harsh outdoor environment.

**QUESTION 15:**
DO YOU SUPPORT THIS MARKET SURVEILLANCE AND ENFORCEMENT POLICY FOR RTTE?
ARE THERE ANY SPECIFIC SUGGESTIONS IN THIS REGARD?
................................................................................................................ 21

<u>Answer 15 :</u>
RigNet agrees with the need to have certain market surveillance and enforcement to deter
unregulated and illegal users.

# RigNet

always connected.

### QUESTION 16:
ARE THERE ANY SPECIFIC ISSUES THAT SHOULD BE ADDRESSED AT THIS STAGE TO
ENSURE A PROPER TRANSITION FROM THE CURRENT TYPE APPROVAL REGIME TO THE
NEW ONE? .......................................................................... 21

### Answer 16 :
RigNet agrees with the proposed and suggests ability to pick up type approval stickers for previously
type approved equipment for ease of return to manufacturer and return from repair.
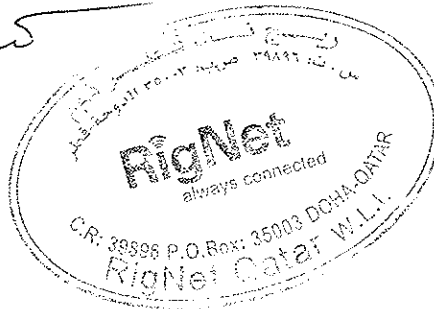
### QUESTION 17:
ARE THERE ANY OTHER SUBJECTS OR ISSUES THAT SHOULD BE ADDRESSED IN THE TYPE
APPROVAL POLICY? ............ 25

### Answer 17 :
RigNet wishes to ensure that in all processes considerations are made for the import and stocking of
spare parts. Critical spares are essential for maintaining quality of services.

**Chris C. Lambert**
**General Manager**
**RigNet Qatar W.L.L**
**Tel: +0974 458 6011**
**Fax: +974 458 6001**

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# Schlumberger comments on ICT Qatar Questions

**QUESTION 1**: ictQATAR invites comments about the scope and objectives of the proposed Type Approval Policy.

**Schlumberger comment:**
Schlumberger believes that the proposed type approval policy is better than the existing one.

**QUESTION 2**: ictQATAR seeks views on the proposed parties that can apply for Type Approval.

**Schlumberger comment:**
Just a good comment on ictQatar approach towards the type approved process is that the Type Approval is only required once for any equipment and is for unlimited duration as long as the type approved equipment maintains the same technical specifications.

**QUESTION 3**: Do you've any comments about the proposal that once a type of RTTE is approved by ictQATAR, any eligible importer can import the same type of RTTE.

**Schlumberger comment:**
This is good news

**QUESTION 4**: Do you have any comments about the Simplified Type Approval Process. In particular, are there any other requirements that should be submitted with the Type Approval application?

**Schlumberger comment:**
Having ictQatar label marked on every piece of equipment could cause delay in the type approval process since the equipment missing labels could be rejected or held during importation.

**QUESTION 5:** Do you have any comments about the Standard Type Approval Process. On particular, are there any other requirements that should be submitted with the Type Approval Application?

**Schlumberger comment:**
Schlumberger would like to know the type of Tests proposed. A Sample from ictQATAR would be good allowing vendors to proactive test their systems.

**QUESTION 6**: Do you've any comments about having two Type Approval processes?

**Schlumberger comment:**
No comment.

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> **QUESTION 7**: Are there any particular criteria or issues that ictQATAR should take into consideration in determining the recognized standards?

**Schlumberger comment:**
No comment.

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> **QUESTION 8**: Do you have any comment about the validity period of Type Approval?

**Schlumberger comment:**
No comment.

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> **QUESTION 9**: Are there any comments about the proposed fees?

**Schlumberger comment:**
No comment.

---

> **QUESTION 10**: Are there any comments about the proposed importation process? In particular, do you support the proposed that an Authorized Importer can import any RTTE (from any brand) that (i) has been type-approved by ictQATAR and (ii) contains a valid warranty for consumers in Qatar?

**Schlumberger comment:**
No comment.

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> **QUESTION 11**: Is there any specific information that should also be included in these registers?

**Schlumberger comment:**
No comment.

**QUESTION 12**: ictQATAR invites comments about the proposed policy for customs clearance.

**Schlumberger comment:**
No comment.

**QUESTION 13**: ictQATAR invites comments about the proposed policy for selling RTTE in Qatar.

**Schlumberger comment:**
No comment.

**QUESTION 14**: Are there any specific comments or issues regarding the proposed marking and labeled policy?

**Schlumberger comment:**
No comment.

**QUESTION 15**: Do you support this market surveillance and enforcement policy for RTTE? Are there any specific suggestions in this regard?

**Schlumberger comment:**
No comment.

**QUESTION 16**: Are there any specific issues that should be addressed at his stage to ensure a proper transition from the current Type Approval Regime to the new one?

**Schlumberger comment:**
No comment.

**QUESTION 17**: Are there any other subjects or issues that should be addressed in the Type Approval Policy?

**Schlumberger comment:**
No comment.

04 June 2009

Mr. Ahmad Sultan
Licensing Section Manager
Policy and Economic Affairs Department
Regulatory Authority
The Supreme Council of Information & Communication Technology (ictQATAR)
19th floor, Al Nasr Tower, Corniche Road
P.O.Box 23264
Doha – Qatar


**Response to the ictQATAR Consultation on Type Approval Policy**


Question 1: ictQATAR invites comments about the scope and objectives of the proposed Type Approval Policy.

SES supports the general scope and objectives of the proposed objectives of the Type Approval Policy.  In particular SES is supportive of the work ictQATAR is carrying out in opening up the market in Qatar to all telecommunications equipment that can shown to have met objectively set criteria.  SES believes that this step forward will help ictAQATAR in its aim of facilitating competition in supply and choice in Qatar.  SES has experience of working with type approval requirements around the world and we are grateful for this opportunity to provide a satellite operator's perspective on ictQATAR's proposals.


Question 2: ictQATAR seeks views on the proposed parties that can apply for Type Approval.

We support the list of proposed parties.  However, we would ask that the application for RTTE certification run parallel to any application process required for certification as an 'Authorized Importer'.  This will ensure that any party wishing to enter the market with an innovative product will not be unnecessarily delayed from providing its product to Qatari citizens due to the requirement of completing the 'Authorized Importer' application process prior to completion of the RTTE certification.  SES believes that a combined process will ameliorate this possible barrier to entry.


Question 3: Do you have any comments about the proposal that once a type of RTTE is approved by ictQATAR, any eligible importer can import the same type of RTTE?

We believe that this is a very positive approach from ictQATAR.  However, the fees associated with the RTTE process must be kept at a reasonable level, and there must be certainty that they will not be changed at short notice.  There should also be a clear process for making all players in the market aware of any fee changes well in advance of them coming into force.  This is to ensure that there is certainty for all players as to the process and fees required to complete RTTE certification, and allow them to design equipment accordingly.

**Question 4: Do you have any comments about the Simplified Type Approval Process. In particular, are there any other requirements that should be submitted with the Type Approval application?**

SES believes that ictQATAR has correctly identified the key requirements that should be submitted with the Type Approval application.  We are also supportive of the approach by ictQATAR to recognise the relevance of type approval by another accredited organisation.

**Question 5: Do you have any comments about the Standard Type Approval Process. In particular, are there any other requirements that should be submitted with the Type Approval application?**

ictQATAR should make efforts to ensure that applicants are made aware at an early stage if equipment is required for testing.  The applicant should also be made clearly aware of the timeframe within which a decision will be made.  We support the approach by ictQATAR to provide detailed reasoning as to why any RTTE will not be accepted for type approval and to work with the applicant to help them to resubmit their application.

**Question 6: Do you have any comments about having two Type Approval processes?**

SES supports the approach taken by ictQATAR.  We would ask that ictQATAR is open with applicants as to the timeframe within which they can expect a response and ensure that it is kept to a minimum.  In particular, with regard to RTTE which already has type approved status with another organisiation, ictQATAR should ensure that the ictQATAR process is as streamlined as possible to ensure that the applicant can move quickly towards the provision of equipment within Qatar that will benefit Qatari citizens.

**Question 7: Are there any particular criteria or issues that ictQATAR should take into consideration in determining the recognized standards?**

SES asks that ictQATAR looks at a broad range of type approving bodies to ensure that it does not duplicate work already completed with regard to a specific piece of equipment.  We support the approach taken by ictQATAR to publish on its website a list of standards it recognizes, but we ask that ictQATAR ensure that this list remains flexible and that further standards be added to the list in the future as appropriate.  If required, SES is happy to discuss with ictQATAR the main type approving bodies for satellite applications.

**Question 8: Do you have any comments about the validity period of Type Approvals?**

We support the unlimited length of the validity period of the Type Approvals. However, we suggest that when a piece of equipment is presented to ictQATAR the option is available for a variety of radio frequencies of operation to be specified. If subsequently the importer wishes the device to be used outside this range then ictQATAR should require it to submit for a new Type Approval.

Question 9: Are there any comments about the proposed fees?

SES believes that ictQATAR has set the fees at a fair level. However, it should monitor the costs incurred by applicants with regard to other elements of the process to ensure that the cost of the process does not become a barrier to entry.

Question 10: Are there any comments about the proposed importation process? In particular, do you support the proposal that an Authorized Importer can import any RTTE (from any brands) that (i) has been type-approved by ictQATAR and (ii) contains a valid warranty for customers in Qatar?

We believe that ictQATAR has taken a very brave approach and we whole-heartedly support it. If we have any concern it is the need for a twelve month warranty. We believe that this should be waived where a device has been fitted by a professional. However, some suppliers may choose in addition to have a warranty for customers in Qatar.

Question 11: Is there any specific information that should also be included in these registers?

We believe that ictQATAR have already listed all of the relevant information that is required to be included on its website.

Question 12: ictQATAR invites comments about the proposed policy for customs clearance.

SES supports the proposed policy for customs clearance, however, we are concerned that equipment that requires a licence will need to be licensed before it enters the country. We believe that equipment should be available in Qatar for installation as soon as frequencies are licensed, rather than having to begin the importation process only after access to spectrum is confirmed.

Question 13: ictQATAR invites comments about the proposed policy for selling RTTE in Qatar.

SES supports the removal of the requirement for a Dealer's Licence. This will help to generate more competition in the Qatari market for telecommunications equipment benefitting consumers and ultimately making it easier for innovative technologies to be made available in Qatar.

---

Question 14: Are there any specific comments or issues regarding the proposed marking and labeling policy?

SES believes that there is already a wide body of precedent on the proposed marking and labeling policy. We suggest that ictQATAR take advantage of this when drafting its policies on marking and labeling.

---

Question 15: Do you support this market surveillance and enforcement policy for RTTE? Are there any specific suggestions in this regard?

We believe that ictQATAR should put in place an enforcement policy, but ensure that it does not create unnecessary bureaucracy for retailers of telecommunications equipment. We believe that best practice from other countries that employ a type approval regime could be usefully examined and key precedents drawn from these.

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Question 16: Are there any specific issues that should be addressed at this stage to ensure a proper transition from the current Type Approval Regime to the new one?

We are glad that ictQATAR understand the importance of handling the transition phase. We suggest that ictQATAR transition to the new phase as quickly as possible, whilst maintaining certainty for all players in the market which rules apply at any given time.

---

Question 17: Are there any other subjects or issues that should be addressed in the Type Approval Policy?

SES does not have any further comments at this time.

Mr. Ahmad Sultan
Licensing Section Manager
Policy and Economic Affairs Department
Regulatory Authority
The Supreme Council of Information & Communication Technology (ictQATAR)
19th floor, Al Nasr Tower, Corniche Road


Dear Mr. Ahmad Sultan,

We are a Japanese auto parts manufacturer, who makes radio equipment, such as Remote Keyless Entry System and Immobilizer.

We have recently found that "TYPE APPROVAL POLICY For Radio Equipment and Telecommunications Terminal Equipment Consultation Document" is uploaded on your website, and you are seeking the views of the interested parties.   Accordingly, we are sending our comments as follows:

1.  Accredited laboratories and recognized Type Approval bodies
    − Please provide the information about the specific names of accredited laboratories and recognized Type Approval bodies.
    − For accredited laboratories, please accept those with ISO 17025 certifications.
    − For recognized Type Approval bodies, please accept, not only those in Europe and USA, but also those in other countries with the similar standards.
2.  Modifications to approved equipment
    − Please clarify the criteria to require a new application.
    ◆   New application is NOT required:
        When the modification does not involve changes in RF characteristics.   (Example: Changes in enclosures, numbers of switches, colors, etc.)
    ◆   New application is required:
        When the modification involves changes in RF characteristics.
3.  Warranty document
    − Please exempt this requirement for vehicle-fitted equipment, due to the fact that such documents do not exist for each auto component.   This kind of document is not required for the type approval of other countries.
4.  Technical Standards
    − Please clarify the standards accepted by ictQATAR.
5.  Application manual
    − Please specify when you are going to issue the final version of the application manual.
6.  Labeling
    − Please specify the required dimensions, if any.
7.  License
    − Please make all vehicle-fitted equipment license-free.
    (Reason: It is not practical for all customers, who purchase vehicles, to obtain licenses for individual equipment.)
8.  Others
    −   We hope that this new system will be implemented soon, as we believe it will be beneficial for all related parties, such as equipment venders, importers, and users.   We would also like to request ictQATAR to be ready for the new system and also to inform us of the implementation well in advance.

We hope that our comments will be reflected in your final decision.

Thank you very much for your special attention.

Best regards,

Yuko Shimada
Assistant Project Manager, Group No. 1,
Homologation & Regulatory Affairs Dept.,
Technical Administration Div.,
TOKAI RIKA CO., LTD.

Address: 260, Toyota 3-chome, Oguchi-cho, Niwa-gun, Aichi-ken 480-0195 Japan
TEL: +81-587-95-0093
FAX: +81-587-95-5471
e-mail: yuko.shimada@exc.tokai-rika.co.jp

# Valeo Security Systems

In line with the on-going R&TTE consultation, we would like to address to you our suggestions and change proposals, as follow:

[1] Authorized Laboratories and Authorization Bodies:

Please inform about the name of the authorized labos and bodies. We kindly ask to accept not only the authorized labo but also ISO 17025 certified bodies and/or member of ILAC.
We would like to add some authorization bodies located other than USA or EU because there are some devices for other countries.

[2] Modification after approval:

Please detail the judgment criteria for the necessity of a new application, as explained in the following example below:
     * Application is NOT needed:  Radio device is changed but Radio characteristics are not modified (e.g. shape of case is modified or number of switches are changed)
     * Application is needed:  any modification that impacts Radio characteristics.

Please clarify the judgment criteria for the necessity of a new application (for example, FCC does not require new application if it's minor change, like "less than 3dB of RF power change").

[3] Warranty document:

We would like you to eliminate the requirement of warranty document because any other countries requires such document and there is no warranty document for each piece of part.

[4] Technical Regulation:

Please clarify the Technical Regulation or Standards that ict QATAR officially accepts.

[5] Application process:

Please clarify the timing of issuance of the application procedure and requirements.


Thank you for your special attention to this matter.

Best regards

Jerome Hugot
Valeo Sécurité Habitacle France - Site de Creteil - 42 Rue Le Corbusier - 94042 Creteil - France
- Siège Social: 42, rue Le Corbusier – Europarc - 94042 Créteil Cedex -France

# **Visteon Japan, Ltd.**

1) Accredited Laboratories or recognized Type Approval bodies (4.2)
  * We would like you to clarify which bodies are the accredited laboratories or recognized type approval bodies.
  * We would like you to accept laboratories which have ISO 17025 or are the members of ILAC as the accredited ones.
  * We would like you to include not only EU and US but also other countries as recognized type approval bodies.

2) Modifications to Type-Approved RTTE (4.5)
  * We would like you to clarify the standard regarding necessity of new type approval after modification of radio devices which have been approved once.
<Example>
The following change does not need the new approval:
    Change which is not modified the characteristic of radio communication,
    EMC or output power (Modification of mechanical parts like housings, switches or color)
The following change needs the new approval:
Change which is modified the characteristic of radio communication, EMC or output power.

3) Warranty document (4.2)
  * There is no example that warranty documents are required for radio devices for vehicles in other countries. Also, there is no warranty document for each device. Therefore, we would like you to exempt the radio devices for vehicles from its application.

4) Technical standards (4.3)
  * We would like you to clarify concrete technical standards which ictQATAR accepts.

5) Application procedure
  * We would like you to clarify the timing of publishing "Application procedure" and "Requirements documents".

6) Marking and Labeling requirements (4.11)
  * We would like you to clarify concrete dimensions of Label.

7) License
  * If License is needed for all radio devices for vehicles under the Type Approval Policy now, we would like you to exempt the devices from the license acquisition.
  (Reason: We think that it is not a realistic way that customers of vehicles have to get the licenses for the radio devices which are installed into the vehicles.)

We think that this new type approval procedure is very beneficial for all distributors, importers and users of radio devices. We really hope the early operation of the new procedure with enough preparation at ictQatar. Also, we would appreciate it so much if you could give us previous notice or information to start the new procedure.

## Covering Page for Comments in Response to ictQATAR's Consultation on Type Approval Policy

Responding Party

Name: Matthew Harrison Harvey
Organization: Vodafone Qatar (Q.S.C.)
Address: PO Box 27727 Doha, Qatar
Telephone: +974 7775783 Email: matthew.harrison-harvey@vodafone.com          Date: 02 June 2009

## Consent

By submitting this Response to ictQATAR, the Respondent consents to its publication in full by ictQATAR on its official website or by other media, unless confidential treatment of all or parts of the Response has been requested and follows the criteria set out below.

**Confidentiality** In the event you would like your Response to be treated confidentially, you are requested to also supply ictQATAR with a non-confidential version. The provision of written explanation justifying the need for confidentiality is also necessary. Please note that a failure to provide sufficient reasoning for a request of confidentiality or an additional, non-confidential version of the Response, the request will be treated as incomplete and may result in full publication of the Response. While ictQATAR will endeavor to respect the wishes of Respondents, in all instances the decision to publish Responses in full, in part or not at all remains at the sole discretion of ictQATAR.

Vodafone Qatar Q.S.C ("VQ") wishes to thank ictQATAR for the opportunity to provide comments on the Licensing Framework Consultation Document issued on 26 April 2009 ("Consultation Document"). We apologize for the slight delay on the submission of our response and for any inconvenience this delay might caused.
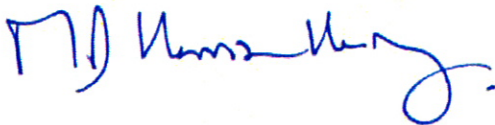
In summary, VQ has the following comments, which we expand in Annexure A ("Response"):

1. VQ is supportive of ictQATAR's objective to ensure that type approval and custom clearance processes to be more efficient, transparent, and simple. However, it is essential that all new processes have clear procedures, criteria for decision-making, and timelines for each step of the procedure.

2. VQ considers that mobile handsets should be in the licensed radio equipments because it could result in many negative market behaviors including the introduction of low standards handsets in the market, and increased black market activities.

3. VQ considers that ictQATAR needs to provide further guidance on the proposed parties that can apply for type approval and customs clearance. As a minimum, such parties must have a license or an authorization from ictQATAR and be commercially registered in the State of Qatar.

We would like to request a meeting with ictQATAR, which could include Qtel and other interested stakeholder, to discuss the consultation document.

I look forward to hearing from you.

Yours Sincerely

Matthew Harrison-Harvey
Vodafone Qatar
Director: Regulatory and External Relations

## Annexure A - Specific answers to the questionnaire

**Q1:** *Should ictQATAR invites comments about the scope and objectives of the proposed type approval policy*

**A1:** VQ fully supports ictQATAR objectives of having more modern, efficient, simple, and transparent policy for type approval. However, VQ is concerned that the proposed parties that can apply for type approval as explained in Answer 2 below.

**Q2:** *ictQATAR seeks views on the proposed parties that can apply for type approval*

**A2:** The following are comments for each of the proposed parties for ictQATAR's consideration:

1. Local and International Manufacturers: Please, can ictQATAR clarify what they mean by local and international manufacturers? For example, would an international company require a local presence for performing type approval in Qatar? Would a Qatari Commercial Registration be required? Would a manufacturer be eligible to type approve RTTE that is not manufactured by it?
2. Authorized Importers: Looking at the definition, it is unclear what the requirements are, if any, for a person or a company to be an authorized importer. What are the criteria for any company to be an authorized importer? As a minimum, VQ believes that an authorized importer in Qatar must be a Qatari commercially registered company.
3. Licensed Operators: The proposed party definition should be "Public Telecommunications networks and services licensees (mobile or fixed)". This is consistent with the license category used by ictQATAR. We agree that such licensee should be able to apply for type approval.
4. Individuals or companies for their own usage (not for marketing/commercial purposes).: VQ believes that there needs to be further clarification on the types of equipment individuals or companies may type approve and also whether there are any quotas on how many can be type-approved and/or import as part of this discussion.

**Q3:** *Do you have any comments about the proposal that once a type of RTTE is approved by ictQATAR, any eligible importer can import the type of RTTE?*

**A3:** In general, we are supportive to the proposal that will simplify the process. However, clear timeline must be in place for each step of the process.

**Q4:** *Do you have any comments about the **simplified** type approval process? In particular, are there any other requirements that should be submitted with the type approval application?*

**A4:** VQ welcomes the new simplified process. Having said that, VQ has the following comments for ictQATAR's consideration:

1. VQ suggests that the full process to be online based. This will significantly increase the efficiency and accuracy of the process.
2. VQ asks ictQATAR to consult with the industry in the process of selecting the recognized type approval bodies or accredited laboratory.
3. If the recognized type approval body clears the RTTE, it is understood that is publicly safe product to be used. Thus, there should be no reason not to approve the RTTE based on public health and safety. ictQATAR should clearly endorse it.
4. This process should take no longer than 24 hours to complete.

**Q5:** *Do you have any comments about the **standard** type approval process? In particular, are there any other requirements that should be submitted with the type approval application?*

**A5:** VQ welcomes a much clearer process and support online applications being used effectively. Having said that, VQ has the following comments:

1. VQ suggests that the full process to be online based. This will significantly increase the efficiency and accuracy of the process.
2. VQ asks ictQATAR to consult with the industry in the process of selecting the testing and measurement bodies that will be recognized by ictQATAR.
3. VQ suggests changing the requirement to submit two samples if requested by ictQATAR to one sample only.
4. This process should take no more than 3 business days to complete.

**Q6:** *Do you have any comments about having two type approval processes?*

**A6:** We support the process. Once again, we emphasis on the necessity of having clear timeline for all steps in the process.

**Q7:** *Are there any particular criteria or issues that ictQATAR should take into consideration in determining the recognized standards?*

**A7:** VQ would like to participate with ictQATAR and the related parties in setting these standards and is offering its international expertise to provide inputs and case studies from around the world.

**Q8:** *Do you have any comments about the validity period of type approvals?*

**A8:** VQ welcomes ictQATAR's proposal for unlimited duration fot the type approval validity.

**Q9:** *Are there any comments about the proposed fees?*

**A9:** We refer to Annexure H of VQ license. Section 2.2 clearly mention that the license fee is set by ictQATAR with a view to cover its regulatory expenses and operation costs. Thus, VQ is submitting for the exemption of any type approval fee as its believed that licensed operator are already paying such fees in a lumsum amount annually.

**Q10:** Are there any comments about the proposed importation process? In particular, do you support the proposal that any authorized importer can import any RTTE (from any brands) that (i) has been type-approved by ictQATAR and (ii) Contains a valid warranty for customers in Qatar?

**A10:** The following points for your consideration:

1. It is very important to include criteria and process on how to become an authorized importer.
2. The definitions of License-free radio equipment, licensed radio equipment, and core network equipment are very general. Detail descriptions are required.
3. VQ disagree with including mobile handsets sets in the license-free category. We believe that this could result in many negative market behaviors including the introduction of low standards handsets in the market, and increased black market activities.
4. The way the proposed process is designed requires a person who is wishing to import RTTE (example, Radio Amateur) for his own use to provide a valid license to own and operate the equipment! We believe it is important to define the list of RTTE that individuals may type approve and import, and what are the specific requirements for those individuals to complete.
5. Clear defining of roles and responsibilities between all parties involved (ictQATAR, customs, and importers) is critical step towards the implementation of the new process.

**Q11:** Is there any specific information that should also be included in these registers?

**A11:** We agree with information specified in the document.

**Q12:** ictQATAR invites comments about the proposed policy for customs clearance.

**A12:** Based in previous experience with the customs staff, it is important significantly important to implement points 1,2,4,5 in Answer 10 above. It is important for ictQATAR to work with the customs authority to be trained on the proposed process.

**Q13:** ictQATAR invites comments about the proposed policy for selling RTTE in Qatar.

**A13:** We suggest including the following condition to the two conditions already mentioned:
- The wholesaler or retailer must have a valid Commercial Registration ("CR") in the State of Qatar. The activities in the CR must include the selling of RTTE for wholesale or retail purposes.

**Q14:** Are there any specific comments or issues regarding the proposed marking and labeling policy?

**A14:** More information is required in the standard type approval process labeling; including guidelines, responsibilities and procedures.

**Q15:** Do you support this market surveillance and enforcement policy for RTTE? Are there any specific suggestion in this regard?

**A15:** Yes. Again, to ensure transparency guidelines are required. For example, for each type of non-compliance, what is/are the enforcement action(s) or measure(s)? In which cases, the retailer or user would be issued an instruction to cease supplying or using RTTE? We would welcome further consultation on this area.

**Q16:** Are there any specific issues that should be addressed at this stage to ensure a proper transition from the current type approval regime to the new one?

**A16:** The following points for your consideration:
1. A clear process and timeline for the further steps of the consultation and decision-making process.
2. Talking with all related parties (in workshops and meetings) to ensure smooth transition.
3. Informing the current distributors and dealers of the new processes quickly and effectively.

**Q17:** Are there any other subjects or issues that should be addressed in the type approval policy?

**A17:** The following is for ictQATAR's consideration:

- Importers, sellers and providers of licensed radio equipments must have a license or an authorization from ictQATAR. VQ will be commenting further on this in further details in response to the separate licensing consultation.

- end -