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ITI Presentation for:
NIST SIT Workshop for the GCC Standardization Organization (GSO) on the GCC Regulatory System for Product Control as Applied to Low Voltage Equipment

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About ITI (www.itic.org)

- Washington DC based trade association of 47 of the world's leading ICT companies (hardware, software, and services)
- ITI advocates for policies that advance industry leadership in technology and innovation; open access to new and emerging markets; promote e-commerce expansion; protect consumer choice; and enhance the global competitiveness of its member companies.
- ITI's Regulatory Policy Committee and associated regional networks work directly with governments around the world to address technical standards and regulations and their associated conformance and testing requirements

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Regulatory Trends for IT Safety

- Industry has a proven track record of providing safe, high quality, state-of-the-art products and has worked with governments and formal standards setting bodies to develop internationally recognized standards including those for product safety (IEC 60950-1, IEC 62368).

- Many regulators have adopted these international standards and also leverage the benefits and transportability of the IECEE CB Scheme for conformity assessment. As a result, this global alignment has greatly facilitated international trade.

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ICT Industry's Objectives for Regulations

- Governments should not stifle innovation and competition among businesses
- Keep regulatory intervention to the minimum necessary to achieve its objectives
- Doing so benefits consumers and the larger community

ICT Industry's Objectives for Regulations

Recommend

Consider alternatives to regulations. If regulations are necessary, ensure that they are not trade-restrictive.

If regulate, adopt **1-1SDoC** approach:

1 Standard: Design products to international standard that is technologically neutral, real-world, performance-based, and technically sound.

1 Test: Test the product ONCE at a competent lab anywhere in the world.

SDoC: Accept the Supplier's Declaration of Conformity and hold the supplier accountable in the marketplace.

Recommend Against

Pre-market requirements that-

Limit flexibility of product design, manufacturing, and innovation

Limit scale of economies due to regulatory market fragmentation.

Delay to market, especially for products w/ short lifecycles.

Impose unnecessary compliance complexity on supply chains

Increase cost from redundant testing, certification, etc.

Or Market surveillance that inappropriately stops shipments & damages brand.

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Benefits for Stakeholders from 1-1SDoC and Post-market Surveillance

For Domestic and Global manufacturers:

- Reduce variations in design and manufacturing
- Provide products at less cost.
  - -Reduce cost for personnel/resources
  - -Reduce testing and certification
- Expect earlier revenue flow
  - -Reduce barriers to foreign markets

For Users/Customers:

- Benefit from earlier access to cutting edge technology at lower price.

Support for GCC Conformity Marking

- With the majority of Middle East countries accepting CENELEC and ETSI (European) test reports, industry encourages the adoption of the EU model of the Single Declaration of Conformity (SDoC) under the GCC LVD
- SDoC model in Europe's LVD for ~20 years has worked for ICT
- Cost-effective and efficient from a supplier's perspective
- This approach works very well for both Small Medium Enterprises (SME), Multinational Corporations (MNC) Market Surveillance Authorities, resellers, and consumers alike

Recommendations for Referencing Product Safety Standards

- Product safety regulation that references **IEC 60950-1 Second Edition**
- Prepare for **transition to IEC 62368***
- **Allow for adequate transition period**. In general, manufacturers should be held to implement revisions in the standard for all existing products and new products by the end of the 5-year transition period.

Conformity Assessment Recommendations

- Set requirements for recognition of the Supplier's Declaration of Conformity ("Acknowledgement") based on:
  - Type testing from approved authority, including acceptance of IECEE CB test reports (RMT/SMT, as well)
  - Conformity to ISO/IEC 17050 Part 1, and
  - Supporting documentation that conforms to ISO/IEC 17050 Part 2, for traceability, availability, retention period, and contents

- Allow IT products be marketed on the basis of this Declaration

Conformity Assessment Recommendations

- Need to define "manufacturer." ITI recommends the following:

  A manufacturer is the person who is responsible for designing and manufacturing a product with a view to placing it on the market on his own behalf.
  The manufacturer has an obligation to ensure that a product intended to be placed on the market is designed and manufactured, and its conformity assessed, to the essential requirements in accordance with the provisions of the applicable [directives].
  The manufacturer may use finished products, ready-made parts or components, or may subcontract these tasks to have products designed, manufactured, assembled, packed, processed or labeled with a view of placing it on the market under his own name and thus representing himself as the manufacturer. However, he must always retain the overall control and have the necessary competence to take the responsibility for the product.*

* See the European Commission's "Guide to the implementation of directives based on the New Approach and the Global Approach" Section 3.1 (2000)

Conformity Assessment Recommendations

- Minimize administrative requirements (e.g. having in country representative maintain technical files and Declarations for ten years, which is difficult and costly).
- ITI supports EU type system, whereby GCC mark on product, document, or box indicates compliance, while the Declaration is signed by the responsible party putting the product on the market.
- Some things to avoid:
    - expiry date or validity period of Declarations
    - mandatory factory inspections by GCC member(s)

Avoid Overlaying ICCP-Type Requirements

- Issue: Products undergo certification, after which every shipment faces an additional inspection at port of export. Given the complexity of global supply chains, this is an extremely burdensome process that imposes unnecessary administration and creates delays getting goods from the factory to customer– without increasing product safety.
- Such pre-inspection requirements may be being phased out, however, they continue to have an unnecessary impact on trade.

Additional Considerations

In developing future requirements for LVD or other areas, consider:

- How new or revised requirements will affect **legacy products** and installed base (including service parts and warranty parts). CB models for product transitions are good examples of safety and efficiency for the marketplace as well as the manufacturer. (The EU has hard and fast rules which require much product churn only for administrative purposes.)
- Avoid mandatory **marking**, but if mark/labels are necessary simplify and minimize requirements (color, language, etc.) and especially consider limited product space of ICT devices and **e-labeling option**
- **Transition times**: allow for adequate transition periods in order to meet new or revised compliance criteria, taking into account the extreme complexity of global supply chains
- Significant **national deviations** will reduce effectiveness of any regional program

Thank You

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Backup Slides

Issue: Transition to IEC 62368-1

- Regulators may not know about the significant change with IEC 62368-1, and not allow adequate time to transition.

Risks

- Premature disruption of product safety practices
- A rush to comply with the new standard IEC62368-1 with known issues
- Unprepared manufacturers, suppliers, test houses and certification bodies
- Balkanization of regulatory requirements

Recommendation

- ITI supports the recommendation within the standard that its requirements not be adopted as mandatory until 5 years minimum after publication (8 years recommended).
- During the transition period, permit suppliers to choose compliance of a product with either IEC 62368-1 or with the existing applicable IEC safety standard (i.e., IEC 60950-1, or IEC 60065).
  - Components certified to IEC 60065 or IEC 60950-1 should be acceptable without further evaluation to IEC 62368-1.
  - Products already on the market should not need to be recertified.
- After the transition period, all new products shipped should conform to IEC 62368-1.