

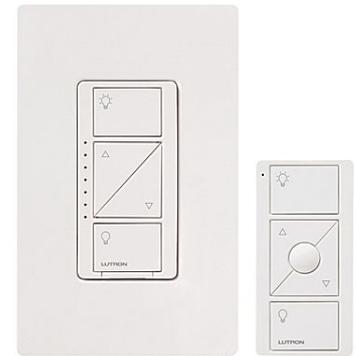
STRATEGIES FOR CONFORMITY ASSESSMENT PROGRAMS TO ENCOURAGE WORLD-CLASS PRODUCTS

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BACKGROUND

- I am a Standards Engineer with 14 years of experience in product design, regulatory approvals and regulatory requirements research. In my present role, I am responsible for global product certification.
- I participate in standards dev't through the *National Electrical Manufacturers Association (NEMA)* and am an active member of the *International & Regional Standards Committee (IRSC)*.
- Lutron is a world leader in the area of lighting controls.



ROLE OF CONFORMITY ASSESSMENT

- Why do Conformity Assessment?
- I believe the goal of Conformity Assessment is to ensure that only safe, World-Class products are sold.
- Based upon my experience, I'd like to share 7 recommendations on the best ways to accomplish this goal.



1. DEFINE A CLEAR & PUBLIC SCOPE

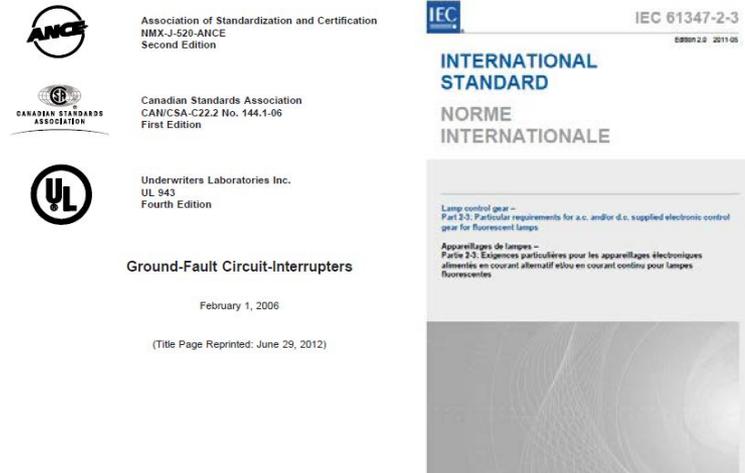
- Conformity Assessment Programs need a clearly-defined scope.
- This scope must be publicly available.
- All stakeholders should reference same scope
 - Manufacturers / Importers
 - The Public
 - Enforcement Agencies
 - Customs (especially important when used for enforcement)

2. USE REGIONAL/INTERNATIONAL STANDARDS

- Large catalogue of safe, compliant, World-Class Products
 - No engineering redesign
 - No administrative changes

- Types

- UL/Canena Standards
- IEC/CENELEC Standards



- Use Edits or National Deviations only as necessary to protect safety for specific, unique needs.

3. KEEP STANDARDS UP-TO-DATE

- Innovation always leads standards development.
- Standards constantly evolve. Why?
 - Allow new technology
 - Raise the bar in performance.
- World-Class products follow both of these trends.

4. HARMONIZE RF SPECTRUM

- Wireless products are now ubiquitous.
- Many product use Unlicensed Bands for Short Range Devices (SRDs).
- 2.4 and 5 GHz are common, but SRDs often use other harmonized bands, such as 433.05-434.79 and 866-870 MHz.
- Harmonization with ITU Recommendations for ISM bands will allow market access to existing, World-Class products.



5. ESTABLISH A REASONABLE FEE STRUCTURE

- Costs to manufacturers should not be so high as to discourage Conformity Assessment and maintenance.
 - Initial cost for CA (such as testing, certification, initial factory inspection)
 - Maintenance cost for CA (such as annual fees and factory inspections)
 - Fees for modifications/improvements to products.
- Costs that are excessive reduce product availability and limit product modernization.
- Fees are ultimately passed down to consumers.



6. LEVERAGE EXISTING PRODUCT APPROVALS

- Carefully weigh the need for factory inspections. Consider exempting factory with...
 - CIG-023 factory inspection reports and/or UL FUS reports.
 - Quality Management System Registration, such as ISO 9001.
- Carefully weigh the need for in-country (repeated) testing. Consider accepting accredited, 3rd party test reports, like UL or CB reports.



- Accreditation demonstrates competence in specific areas. Use accredited bodies to bolster integrity of CA program.

7. EDUCATE, ENFORCE, and EXECUTE



- Public outreach is needed to ensure demand.
- Conformity Assessment requirements should be enforced to create an equitable market.

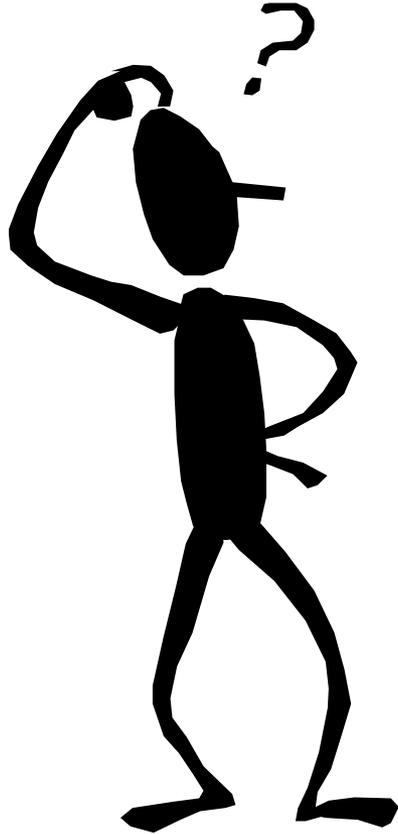
- Enforcement should not be considered a funding method for Conformity Assessment; penalties must be reasonable.
- Market surveillance cannot be done by Customs alone.
 - Must be applied to imported and national products.
- Certification Bodies must be adequately staffed.



SUMMARY

1. Define a Clear and Public Scope
2. Use Regional/International Standards
3. Keep Standards Up-To-Date
4. Harmonize RF Spectrum
5. Establish a Reasonable Fee Structure
6. Leverage Existing Product Approvals
7. Educate, Enforce, and Execute

QUESTIONS?



THANK YOU

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