

Radio Equipment Directive Proposal

The Digital TV Group (DTG) welcomes the opportunity to respond to the above consultation on the Radio Equipment Directive Proposal.

According to your own classification and as a respondent, the DTG can best be described as a business representative organisation/trade body.

The DTG welcomes the commitment to reducing cost to businesses and invites a revision to the existing Directive aimed at simplifying and improving its scope. Furthermore, the DTG supports the removal of a notification process and a reduction in marking requirements; especially for those devices which use non EU-wide harmonised frequency bands.

1. Do you think the proposed possibility for a requirement to register products within a central database that have attained a low level of compliance is reasonable, proportionate, and achievable? Will the proposed possible registration requirement place increased burdens on SME's?

Forcing devices with a low level of compliance to register with a central database may increase the costs of compliance and therefore undermine their appeal to consumers as these devices are typically low-cost. The DTG believes a central database is therefore a disproportionate solution and would instead encourage the Commission to ensure that even the lowest level of compliance is adequate enough to mitigate against any potential interference.

2. The Proposal includes the possibility to require radio equipment to interoperate with accessories such as chargers. What effect might this have on the market for products coming within scope?

Whilst improved interoperability in this area is undoubtedly in the consumer interest - on which many in the industry would like to make more progress, the scope of radio equipment potentially covered by this directive is so diverse in functionality, power requirements and the accessories that connect to it, that the extent to which this is possible is currently unclear. Consequently, the inclusion of any new requirements on interoperability of accessories in this directive without much more careful consideration and consultation could be very damaging and we recommend that it should be omitted.

3. Do you agree with the inclusion within the Proposal for the provision of a framework for the use of innovative technologies e.g. software-defined radio equipment, with the caveat that only compliant combinations of software and hardware come together? Have you any suggestions as to how it might be improved?

The DTG has knowledge of testing hardware and software implementations and our experience leads us to suggest that in order to ensure conformance, complete integrations should be tested as integration of non-conformant components can lead to a non-conformant product.

4. Do you welcome the proposed simplification and reduction of administrative burdens including the removal of the requirement to notify equipment under current articles Article 6(4) and the obligation to affix an equipment class identifier on the product (current Annex VII(5))?

Yes.

5. The proposed new definition of radio equipment to include only radio equipment that intentionally transmits together with the proposed reduction in scope in relation to telecommunications terminal

This document has been written using feedback from the DTG's membership but does not necessarily represent the views of all DTG members organisations. Please note that the DTG is made up of member companies who may also be submitting an individual response to this OFCOM consultation.

equipment removes from scope receive only (stand-alone) radio receivers and fixed-line terminals. Do you think this would be an improvement? Please provide reasons for your answer.

No. In order to allow for future innovation on transmit/receive devices, receive only devices would need to be in scope of the same policy. If covered by a separate policy, potential exists for misalignment leading to interference issues and sub-optimal use of the radio spectrum.

6. Do you have any other comments that might aid the consultation process as a whole?

No comment.

About the Digital TV Group (DTG)

The Digital TV Group (DTG) is the focal point of the UK's digital TV industry. The Group, a not-for-profit membership organisation, brings the industry together to enable the successful delivery and evolution of digital TV and associated technologies.

The DTG publishes and maintains the technical specification for the UK's Freeview and Freeview HD platforms and Connected TV (the D-Book) and runs the digital television industry's test centre: DTG Testing.

To encourage international harmonisation, the DTG is engaged with DECE (Ultraviolet), ETSI, HbbTV and the Open IPTV Forum. The DTG allows Digital Europe to use areas of its copyright under licence.

DTG Testing tests digital TV products applying for the Freeview, Freeview+ and Freeview HD logos against the D-Book standard.

DTG Testing also manages the Engineering Channel for continuous maintenance of the UK's Freeview and Freesat platforms, and maintains a receiver collection for testing new transmission modes and software downloads.

The DTG and DTG Testing supports the development and deployment of next generation technologies such as LTE (4G), TV white spaces, second screen and home networking.

- DTG Group <http://www.dtg.org.uk>
- DTG Testing <http://www.dtgtesting.com>
- What is the D-Book? <http://www.dtg.org.uk/industry/dbook.html>