

International Approvals



International Approvals for 5 Important Countries

Insights for Simplifying
International Approvals
in Challenging Markets



Presented by:

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Agenda



- Sample Questions
- India (TEC)
- Indonesia (SDPPI)
- Mexico (IFT & NYCE)
- Russia (EAC, FSS & FAC)
- South Korea (KCC)
- Summary



Sample Questions



- Will the new TEC regulation remain Aug 1st and will my equipment need mandatory testing in India?
- Is there new label requirements for India TEC?
- How is our company affected by the new Mexican Regulation starting in June of this year?
- Our company has an Indonesia product request and need to know what is the procedure and options for getting our products certified?
- Does our products require EAC, FSS, and FAC certification when trying to get into Russia.
- Our current product will be adding a BLE radio to the next generation model. Will I have to test in South Korea and do they allow for Modular certifications?

Recent developments as of July 4th, 2019

➤ Three Important dates to remember:

1. July 5th, 2019: TEC Application Web Page (MTCTE Portal) opens.
2. July 9th, 2019: Beginning of Applications acceptance.
3. Oct 1st, 2019: TEC certifications become mandatory after a two-month delay (originally Aug 1st, 2019) for a much smaller subset of the originally announced product categories.

➤ TEC [Notification MTCTE (No. TEC/01/2017-TC)] has confirmed that they will start with a total of 11 SCS + 2 GCS products:

➤ SCS (Simplified Certification Scheme):

2-wire Telecom Equipment (items 1-8)

- | | |
|--|--------------------------|
| 1. Executive telephone system | 2. NSD/ISD payphone |
| 3. Electronic telephone instrument | 4. Key telephone systems |
| 5. 2-line feature phone | 6. Coin box telephone |
| 7. Terminals for connecting to PSTN | 8. CLIP phone. |
| 9. Modem | 10. G3 FAX machine |
| 11. ISDN customer-premises equipment (CPE) | |



Recent developments as of July 4th, 2019 – continued.

➤ **GCS (General Certification Scheme):**

1. Cordless telephone
2. Private automatic branch exchange (PABX)

***Note: The mandated date for the above products (October 1st, 2019 as of today) could be moved ahead, depending on the approval process and how many approvals TEC is able to deliver in the 2 months period.**

- **Items not listed in the first release date will not be allowed to apply for product approval, your company can continue to ship products as usual until dates for the products become available. The ER standards for the other products not yet listed have been withdrawn temporarily.**
- **Testing can be done in India by approved laboratories, however TEC has also made provisions for testing results and reports from labs accredited by ILAC signatories to be accepted. Addendum [No. TEC/10/2018-TC (Pt.)] allows for relaxation to the MTCTE procedure until March 30th, 2020.**
- **Annexure-II allows for Associated Models and Family Product Definitions. Meaning a maximum of 10 associated models can be included in one Certificate.**



Recent developments as of July 4th, 2019 – continued.

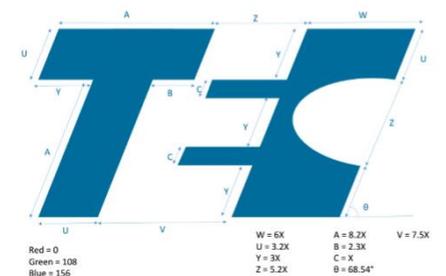
➤ **Addendum to MTCTE Procedure (Provisional Certificate) :**

1. If test reports do not meet the full requirements of the ER that applies to the product, test reports can be submitted and tests not conducted in the report can be temporarily exempted as a relaxation to the MCTCE procedure, resulting in a Provisional Certificate.
2. Addendum MTCTE Procedure [TEC/10/2018-TC (Pt.III)], Provisional Certificates shall have a validity period of 2 years. With this Provisional Certificate, the manufacturer can ship its products into India. Once the requested testing is completed and the results are submitted to TEC, it will issue a final certificate.
3. Labeling on Certified products shall be exempted initially for a time of 6 months from October 1st, 2019.

➤ **Labeling Guidelines:**

1. Should include TEC logo and certification number. Indication of equipment conforming to ER in the technical document.
2. Aspect ratio of logo needs to be maintained with a 6mm minimum height and 12mm maximum height.

INDIA
CERTIFICATE NO:
MODEL NO:



Indonesia (SDPPI)



Changes since Aug 8th, 2018

- It is now Mandatory for Overseas Companies to have an Indonesian company as the certificate holder (usually a distributor or real importer).

Additional requirements for companies:

1. If the certificate holder is currently the Overseas Company, shipping products into Indonesia is not allowed. A new application for approval needs to be submitted or if the certificate is in the process of renewal, then the Indonesian company (new certificate holder) for the new Certificate can be addressed at that time.
 - a. After the issuance of the new certificate, a new Label with the new certificate number and PLG ID needs to be made and applied to the product.
2. If a company uses multiple Distributors, then the additional Indonesian distributor will require their own certificate.
 - a. Each Label is dependent on the distributor who imports the product. If a manufacture has multiple distributors, multiple labels need to be made.



Indonesia (SDPPI)



Changes since Aug 8th, 2018 – continued.

- Although Indonesia has an In-Country testing requirements, various approval options are available for different products.
 1. Option A: All testing done at the SDPPI lab in Indonesia.
 - a. Advantages - Lower testing/certification cost, reports are always accepted and no modifications needed to the reports to meet certifiers requirements.
 - b. Disadvantages - Long lead Time for Testing and certification, samples required, personnel to support testing and shipping, possible damage to equipment during shipping.
 2. Option B: Certification by document evaluation.
 - a. Advantages - Short Lead Time to certification, no samples to ship, only documents required.
 - b. Disadvantages - Higher cost, reports need to be done by a lab listed on Indonesia website.

*Note: If the product has GPON/ONT/OLT capabilities, then Option A needs to be chosen due to regulation stating “all GPON/ONT/OLT devices require functional testing to do done at Indonesia lab”.
- Labeling Guidelines: Certificate Holder required to put label on product.

<u>XXXXX/SDPPI/YYYY</u> ZZZZ	xxxxx= Certificate number, yyyy= Year of Cert, ZZZZ=PLG ID: Customer ID (Applicant)
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Mexico (IFT & NYCE)



NOM Changes as of June 3rd, 2019

➤ New Regulation requirements:

1. All electrical/electronic products cannot be imported to Mexico without demonstrating compliance with all applicable NOMs for all electrical/electronic products.
2. All valid certificates issued before June 3, 2019, shall display the New Mexican 8-digit HS tariff code to be accepted in Customs.
3. NOM certificates must be reissued by the certification body (CB) with the new designator.

➤ Clarification for Certificates requiring to be reissued:

1. Existing Safety (NOM-001 and NOM-019) certificates issued for your local rep company, if not acquired through an importer do not require to be updated. Local representatives are not the actual importer of any product.
2. NOM-001, NOM-019, NOM-029, and NOM-032 certificates must be issued for the actual importer as local reps. in order to for importation and clear customs (Local reps can be listed). The noted NOM certificates issued for the actual importer must be updated to include the HS code/designator.

*Note: In summary, the scope is more redacted for the importer. The actual Mexican Importer of the product must have his own certificate (for Safety) to their name. The certificates under the name of actual importers are the ones that need updating to the New Regulations.



Mexico (IFT & NYCE)



NOM Changes as of June 3rd, 2019 – continued.

➤ **Clarification for Certificates requiring to be reissued - continued**

3. All NOM-208 certificates (Wireless) no matter who the local representative is (Actual Importer or Local Rep) must be updated to include the HS code and designator for a product or module to be imported.

➤ **Fixing the Certificate to comply with New Regulation**

1. Simply fill out the “HS code reprint form” and NTS will submit the form on your behalf. There is no cost associated with this, however due to the huge number of request, process is 4+ weeks. If the reprint is needed sooner, an expedite charge is available for 1 day turnaround.

POR ESTE MEDIO, SOLICITAMOS LA REIMPRESIÓN DE LOS SIGUIENTES CERTIFICADOS CON SU RESPECTIVA FRACCIÓN ARANCELARIA:

Empresa	Descripción	Marca	Modelo	No certificado	FRACCION ARANCELARIA



Mexico (IFT & NYCE)



NOM Changes as of June 3rd, 2019 – continued.

➤ **New 8 digit Mexico HS Code.**

1. **Two easy ways to get the Complete list of new 8 digit Mexico HS codes.**

a. **NTS can provide you with an Excel document listing all 700 new H.S. Codes.**

ANEXO 2.4.1				
NUMERAL	FRACCIÓN ARANCELARIA	DESCRIPCIÓN	ACOTACIÓN	NOMS
Art 1	8443.31.01	Máquinas que efectúan dos o más	Únicamente: De procesamiento de datos d	NOM-019-SCFI-1998
Art 1	8443.32.01	Máquinas para imprimir por chorr	Únicamente: De procesamiento de datos d	NOM-019-SCFI-1998
Art 1	8443.32.02	Impresora láser, con capacidad de reproducción superior a 20 páginas por n		NOM-019-SCFI-1998
Art 1	8443.32.03	Impresoras de barra luminosa electrónica.		NOM-019-SCFI-1998
Art 1	8443.32.05	Impresoras por transferencia térmica.		NOM-019-SCFI-1998
Art 1	8443.32.06	Impresoras ionográficas.		NOM-019-SCFI-1998
Art 1	8443.32.07	Las demás impresoras láser.		NOM-019-SCFI-1998

b. **Go to the URL <http://www.economia-snci.gob.mx> and look for the digits, 2 by 2 in each column from left to right. Once the HS code is verified to be correct, the new code can be used to apply for reprint. If you are currently doing a renewal or new application, only the HS code will be required since Mexico will automatically provide a new Certification number.**



Russia (EAC, FSS & FAC)



No recent changes however Regulations often misunderstood

➤ **EAC - CU (Custom Union):**

1. AC and DC products are not allowed on the same CoC or DoC.

a. Products with the supply voltage of 50-1000Vac evaluated to TR CU 004 (LVE) and TR CU 020 (EMC)

b. Products with the supply voltage of 75-1500Vdc evaluated to TR CU 020 (EMC).

c. Since DC models applicable only EMC regulation, but for AC models LVE and EMC regulations, legally the two different products cannot be joined into one CoC or DoC.

➤ In country testing not required, however samples required for construction review.

➤ **FSS (Federal Security Service) notification:**

1. FSS notification is a document required to clear customs for products, which contains encryption. (e.g. authentication, Wi-Fi encryption etc.).

2. The Notification is required to be registered in the security agency of EAEU member-state (in Russia - FSS) a Russian Registry, before the product can pass through customs.

***Note: Both EAC and FSS are required to pass through customs as long as encryption is used in the product.**



Russia (EAC, FSS & FAC)



Russia – continued.

- **FAC (Federal Agency of Communications):**
 - **FAC approval is mandatory for most Telecom and Wireless products.**
 - **Two type of Approvals possible for FAC. Type of product determines approvals method.**
 - 1. FAC Certification.**
 - a. Family approval allowed, but is product dependent.**
 - 2. FAC Declaration.**
 - b. Per model approval only.**
 - **FAC approvals can be obtain by test reports to EU standards.**
- *Note: Products using Wireless technology and encryption, would required all 3 approvals (EAC, FSS, FAC)**



South Korea (KCC)



Navigating thru Modular Approvals vs. End Product Certification

- Testing can be done in at US Labs and In Country depending the following conditions:
 1. Testing in US laboratories is allowed if the test lab has all the MRAs (Mutual Recognition Agreement) in place for the product and technology incorporated with the device to be Certified.
 - a. Advantages - Easier to support testing, no cost or damage associated with shipping of product, testing can be done in conjunction with other agencies requirements to save on cost.
 - b. Disadvantages – Cost for testing if country is added during a future release date.
- South Korea allows modular certifications:
 1. How the radio module has already been approved and the End Product type determines if the End Product needs to be certified at the system level.
 - a. Certified radio module is RF *and* RF EMC tested (Full):

If the end-product is required to obtain Conformity Certification (RF) only (strictly radio device), then *no additional testing* is required on the end-product. Just add radio certification information to end product.



South Korea (KCC)



Navigating thru Modular Approvals vs. End Product Certification – continued.

b. Certified radio module is only RF tested (Limited):

End product is required to obtain Conformity Certification (RF) and Conformity Registration (EMC), then the end product needs to be tested for *EMC and RF EMC and additional registration is required*

Note #1: Whether an RF device is required to obtain Conformity Registration (EMC) or not is determined by how it communicates with other devices, such as computers. The rule of thumb to follow: if communication is done wirelessly only, then it does not need to obtain Conformity Registration (EMC). However, if it has an Ethernet connector, RS-232 connector and/or an USB connector for communication purposes, then it also needs to obtain Conformity Registration (EMC). If the end product has storage capability, then it also needs to obtain Conformity Registration.



Summary



- Country Approvals Throughout the World is Constantly Changing
- Regardless of the changes in regulations, it is the responsibility of the Manufacturer to ensure Certifications and Compliance Documents are Up-to-Date
- Knowing all Certifications and Compliance requirements in advance is Critical for a successful product launch
- It is time consuming and costly if products are Held Up in Customs due to not understanding the Regulations and Requirements

NTS can help Simplify all your International Approvals and Compliance needs Worldwide.



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