



Canadian Experience with Supplier's Declaration of Conformity (SDoC) in the Telecommunications Sector

Presentation for the WTO TBT Committee Workshop
on Suppliers' Declaration of Conformity
Geneva, March 21, 2005

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Overview

- Considerations for the use of SDoC
- Application of SDoC
- Guidelines on the types of SDoC
- Compliance verification and enforcement
- Lessons learned in Canada
- Moving from certification to SDoC
- Policy effectiveness





Considerations for the use of SDoC in the Telecom Sector

- Maturity of the technology and industry
 - International standards
 - Based on experience of the industry and regulator
- Low probability of interference, damage or problems
 - By equipment itself
 - By consumer use
 - Support of accredited conformity assessment organizations
- Facility to monitor and enforce
 - Have a legal framework conducive to verification of compliance and enforcement
 - Regulator's capabilities





Application of SDoC in the Telecom Sector

- Terminal Equipment (Equipment connected to a public network)
 - *Example:* Telephone, facsimile machine, etc.
- Radio Equipment
 - *Example:* Radio equipment used underground, cable locating equipment and intentionally radiating AC wireline carrier devices
- Broadcasting Equipment
 - *Example:* Television set
- Interference Causing Equipment (ICES)
 - unintentional radiators (*Example:* computer equipment)





Terminal Equipment

- SDoC implemented since January 2002
- SDoC applies to all terminal equipment

PROGRAM

- Registration with Industry Canada required
- Testing performed by laboratories recognized by Industry Canada
- Marking of equipment required
- Canadian representative required





Radio Equipment

- SDoC implemented in 1980's
- SDoC limited to equipment with extremely low probability of interference and very low power devices

PROGRAM

- Registration with Industry Canada NOT required
- Testing can be performed at any testing facility (no accreditation required)
- Marking of equipment required
- No requirement for Canadian representative





Broadcasting Equipment

- SDoC implemented in 1950's
- SDoC applies only for Radio Apparatus Capable of Receiving Broadcasting

PROGRAM

- Registration/ Notification to Industry Canada is required
- Testing can be performed at any testing facility
- Marking of equipment required
- No requirement for Canadian representative





Interference Causing Equipment

- SDoC was established in 1990
- Requirements based on international standards
- SDoC applies to all Interference Causing Equipment (Unintentional radiators)

PROGRAM

- Registration/ Notification to Industry Canada is NOT required
- Testing can be performed at any testing facility
- Marking of equipment required
- No requirement for Canadian representative





Industry Canada Telecom SDoC Programs

Equipment Type	Recognized Testing Laboratory	Registration requirement
•Terminal Equipment	X	X
•Broadcasting equipment (Receivers)		X
•Interference Causing Equipment •Low Power License-Exempt Radio Equipment (extremely limited)		

'X' means it is required





Guidelines on the Types of SDoC

- Recent development of Guidelines in WTO Information Technology Agreement (ITA) Committee
 - EMC/EMI regulations in the world are mostly based on international standards and mostly based on SDoC
 - For conformity assessment processes associated with EMC/EMI
 - Contain two types of certification and four types of SDoC
- APEC TEL Mutual Recognition Agreement Task Force also looking at similar guidelines for telecom





WTO ITA Committee Guidelines for EMC/EMI

Four types of SDoC

- **Type 1**
 - Supplier of the equipment declares the equipment meets the regulatory requirements
 - Testing laboratory recognized by the regulator tests the equipment
 - Supplier registers the equipment with the regulator
- **Type 2**
 - Supplier of the equipment declares the equipment meets the regulatory requirements
 - Test reports by a testing laboratory recognized by the regulator
- **Type 3**
 - Supplier of the equipment declares the equipment meets the regulatory requirements
 - Supplier registers the equipment with the regulator
- **Type 4**
 - Supplier of the equipment declares the equipment meets the regulatory requirements





Compliance Verification and Enforcement in Canada

- SDoC requires post-market surveillance
 - Certification is a pre-market surveillance scheme
 - *Telecommunications Act* and *Radiocommunication Act* allow Industry Canada to test equipment and enforce regulations
- Certification and Engineering Bureau of Industry Canada
 - Testing and audits
 - National Centre to coordinate equipment monitoring program
- Inspectors in regional and district offices throughout Canada
- Fines for non-compliance





Verification of Compliance

(cont'd)

Terminal Equipment (TE): Up to 2% is audited each year, focusing on high-risk equipment

- Level of compliance for TE is around **95%**
 - Most non-compliance found relates to improper marking of equipment
- Complaint-based audits (testing of equipment following complaints)

Broadcasting, Radio, and Interference-causing equipment

- Interference investigation process
- Respond to complaints
- Random audits





The Telecom Sector: Lessons Learned

- **Mandatory technical requirements are maintained**
- **SDoC implementation facilitated by the use of:**
 - ISO/IEC standards on conformity assessment
 - International technical standards
- **SDoC can be adapted to risk (e.g., use of accredited testing laboratories and registration)**
- **SDoC coverage can be progressive**
- **Streamlines conformity assessment process**
- **Eliminates or reduces up-front government involvement**
- **Benefits to industry**
 - Lower costs
 - Easier and faster market access
 - Promotes innovation and competitiveness
- **Very few problems with non-compliance**

Works well!





Moving from Certification to SDoC in the Telecom Sector

- Need clear process
- Good communication plan
- Well established technical requirements
- Ability to focus on post-market surveillance





Policy Effectiveness in the Telecom Sector in Canada

- **Fulfills Government of Canada regulatory objectives for the telecoms sector**
 - based on risk and regulatory environment
 - minimum intervention by regulator up-front
- **Compliant with WTO TBT principles**
- **Facilitates trade**





For More Information

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