



March 31, 2021

Australian Communications and Media Authority
Technical Regulation & Carrier Infrastructure Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

By email: techreg@acma.gov.au

Dear Sir/Madam:

Subject: Submission on draft *Radiocommunications Equipment (General) Rules 2021 (Equipment Rules)* (introducing QR Code)

Apple appreciates the opportunity to provide comments on the Equipment Rules, specifically as it relates QR labelling.

We supported the *Radiocommunications Legislation Amendment (Reform and Modernisation) Act 2020 (Amending Act)* to allow new forms of labelling and look forward to working with ACMA during its consultation to introduce the Equipment Rules.

Apple notes the Amending Act repeals the old definition of "label" in the *Radiocommunications Act* to include "a QR code". It is also noted:

1. Suppliers may satisfy the labelling requirements in the *Radiocommunications (Compliance Labelling - Devices) Notice 2014*, *Radiocommunications Labelling (Electromagnetic Compatibility) Notice 2017*, and *Radiocommunications (Compliance Labelling – Electromagnetic Radiation) Notice 2014* by using QR codes; and
2. The Equipment Rules will, if enacted in its current form, retain the Labelling Notices allowing for compliance by way of QR codes.



The change in the Amending Act introducing the QR Codes is most welcomed as devices become smaller and space to label is limited. The Equipment Rules (as currently drafted) are equally sensible.

Apple appreciates the commitment to retain the current radio-communications labelling notices, minimizing complications, and ensuring compliance can be achieved by using a QR code.

Apple would welcome the opportunity to address any ACMA queries with this submission. Please do not hesitate to contact Yan Gao ([REDACTED]).

Sincerely,

Yan Gao

APAC Regulatory Compliance Manager