



## **Mobile & Wireless Forum**

12 December 2022

The Manager  
Infrastructure and Equipment Safeguards Section  
Australian Communications and Media Authority  
PO Box 13112 Law Courts  
Melbourne VIC 8010

By email: [techreg@acma.gov.au](mailto:techreg@acma.gov.au)

Dear Sir/Madam,

### **Re: Consultation on Proposed Changes to Radiocommunications Equipment Regulation 37/2022**

The Mobile & Wireless Forum (MWF, [www.mwfai.org](http://www.mwfai.org)) is an international association of companies with an interest in mobile and wireless communications including the evolution to 5G and the Internet of Things (IoT). The MWF's members include Apple, Cisco, Ericsson, Google, Honor, Huawei, Intel, LG, Motorola Mobility, Motorola Solutions, Qualcomm, Samsung and Sony.

The MWF thanks ACMA for the opportunity to respond to the above-mentioned consultation and wish to provide the following comments.

1. The MWF supports the concept of the General Equipment Rules becoming a 'one stop shop' for radiocommunications equipment regulation and helps ensure that manufacturers have access to all regulatory requirements in the one document for product being sold in Australia. As a result we agree that such an approach will "reduce informational costs for suppliers and users from otherwise interpreting and applying separate legislative instruments".
2. The MWF also supports the general intent of the ACMA in adopting further international standards "to provide suppliers with greater flexibility to achieve compliance with technical performance requirements" and that "suppliers that already comply with the international standards in overseas markets will not have to test and document specifically for the Australian standard".
3. The MWF also supports the proposal to adopt the recently published EME test method standards (IEC/IEEE 63195-1:2022 and IEC/IEEE 63195-2:2022) in Schedule 4 to the General Equipment Rules, thus allowing suppliers to use both computational methods and physical measurements to determine compliance with ARPANSA's EME limits for transmitters operating above 6 GHz. We understand that the intent here is only to replace the interim IEC TR 63170 (and by extension SA TR IEC 63170) and that suppliers will continue to be able to use AS/NZS 2772.2 for instances where the device is normally used more than 20 centimeters from the human body.

Please don't hesitate to contact me if you want to discuss or clarify any aspect of this submission.

Yours sincerely,

Michael Milligan  
Secretary General