TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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April 21, 2015

Malaysian Communications and Multimedia Commission
Off Persiaran Multimedia
63000 Cyberjaya
Selangor Darul Ehsan
Malaysia

Re: *MCMC's Guideline on Certification Mark for Self- Labelling (SL) of Certified Communication Products in Malaysia, Version 2* **(January 2015)**

Dear Sir/Madam:

The Telecommunications Industry Association (TIA) submits these comments to Malaysian Communications and Multimedia Commission (MCMC) in response to its *Guideline on Certification Mark for Self- Labelling (SL) of Certified Communication Products in Malaysia* (Version 2), in which an electronic labeling (eLabeling) allowance is proposed for information and communications technology products that utilize built-in electronic displays and are supported by firmware or operating systems (OS) which can be displayed, stored and retrieved from the product. TIA commends MCMC in putting this forward-thinking proposal forward, which will to ease technical and logistical burdens on manufacturers while increasing end user access to useful information about their devices by allowing for the non-exclusive use of eLabeling ICT. TIA also encourages MCMC to move forward with its planned implementation of its eLabeling allowance on June 1, 2015, as proposed.

TIA is a global trade association which represents hundreds of global ICT manufacturers, vendors, and suppliers on a wide range of policy issues, including equipment authorization policies. TIA's approximately 300 member companies manufacture or supply the ICT products and services used in global communications across all technology platforms, including broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. Members' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is also accredited by the American National Standards Institute to develop standards for the telecommunications industry. For more information on TIA, please visit http://www.tiaonline.org/.

We believe that MCMC recognizes that Malaysia, like other important markets, benefits greatly from the competitive nature of the global ICT equipment market. This environment presents unique challenges to ensuring governments, consumers, and other stakeholders to readily determine whether a device has been properly certified, and to obtain additional information about a device as efficiently as possible. Historically, the use of physical markings or labels have played a key role in providing this important information, but the continuous evolution of industrial design and multiple regulatory environments has led to increased costs and difficulty in ensuring all relevant markings or labels are affixed in an efficient and convenient manner for the user of the device. eLabeling has becoming a natural progression from hard copy labels which will help in streamlining and lowering costs in the manufacturing process, eliminating typographical errors which sometimes appear on hard copy labels, and improving the approval processes by providing ease of access to information for the various constituencies in the device approval process, including MCMC.

TIA supports the eLabeling allowance put forward in MCMC's *Guideline on Certification Mark for Self- Labelling (SL) of Certified Communication Products in Malaysia (Version 2)*, which reflects broad stakeholder consensus that an effective solution to this problem is the non-exclusive use of eLabeling for ICT equipment, which allows consumers and other users access to easily readable and prominently displayed information about each device. MCMC's proposals position it as a leader in the use of regulatory approaches which foster innovation and advance public policy goals, and are also harmonized with the established approaches of the Australian Communications and Media Authority,[1] the United States' Federal Communications Commission's final guidance putting forward an eLabeling allowance for devices with integrated screens,[2] as well as a similar allowance now in place in Canada.[3] We commend MCMC for their inclusive approach to working with the industry to advance the public interest through their solicitation of comments from impacted stakeholders.

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[1] *See* http://www.acma.gov.au/Industry/Suppliers/Supplierresources/Record-keeping/electronic-labelling-equipment-types-i-acma.

[2] *See* https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=27980&switch=P.

[3] *See* http://www.ic.gc.ca/eic/site/ceb-bhst.nsf/eng/tt00099.html.

TIA supports the proposals put forward in MCMC's *Guideline on Certification Mark for Self- Labelling (SL) of Certified Communication Products in Malaysia*, and we strongly encourage MCMC to move forward with the non-exclusive use of eLabeling for ICT equipment as proposed.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: */s/ Brian Scarpelli*

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