

Report on a visit to Ecma TC20 and European Commission

Steering Committee

This is a report on a visit made to Ecma TC20 meeting (convened in Geneva) and European Commission (Brussels) in order to strengthen relations with Europe on EMC.

Members of the VCCI mission

Haruyoshi Nagasawa	VCCI Director
Akihisa Sakura	Chairman of Steering Committee (IBM Japan)
Kohjiro Yamada	Secretariat of Steering Committee
Shigenori Mizuno	Member of Steering Committee (Ricoh)

European Commission's DG Enterprise & Industry

- (1) Date: March 19, 2007
(2) Place: DG Enterprise & Industry (Avenue d'Auderghem 45, 1040 Brussels)
Website: <http://ec.europa.eu/enterprise>

(3) Attendees

DG Enterprise & Industry:

- Mr. Mark BOGERS - Team Leader Electrotechnical Sectors
Mr. David EARDLEY - Low Voltage and EMC Directives manager
Mr. Fabrizio SACCHETTI - Legal officer and coordinator of the Unit's activities relating to Japan
Ms. Natalie CHEVALLIER - Policy officer in charge of relations with third countries in the field of technical regulations and conformity assessment, and WTO TBT issues

ECAB:

- Mr. David IMESON - Director of Compliance Europe Ltd, Chairman of the Group of Notified Bodies under the EMC Directive (ECNCB)

(4) Summary of discussions

First the VCCI side introduced the circumstances in which VCCI came into existence and its track record of 22 years as industry's self-regulatory organization based on SDoC scheme having been contributing to keeping EMI from ITE at appropriate level. Also introduced was Kit Module Program of VCCI recently started to control module level EMI followed by market sampling test conducted on products purchased at shop front with which to enforce VCCI scheme. Attendees from EC showed much interest in market sampling test and asked such questions as follows. (1) How failure rate of purchase based market sampling

test compares with that of loan-base market sampling test? (2) Has there been any case in which test failed due to problem of testing laboratory? (3) What is the size of samples? Our answers to questions were (1) there is no noticeable difference between the two modes of market sampling test, and (2) there has been no such case in the past. The EC side commented that EC plans to conduct market sampling test with focus on checking of CE mark.

Second the EC side talked about implementation status of the New EMC Directives in each country of Europe. Majority of countries have completed the transposition of the Directives into national law, but implementation in few countries will be delayed until July 20. EMC guideline will be released shortly (it was actually released on March 20).

In response to VCCI's disclosure of a news that MOU was signed between Japan and US on mutual acceptance of EMC testing report the EC side commented that while they think MOU is a good scheme it is questionable for EC to enter that kind of relationship with VCCI because there is no department in EU similar to USTR responsible for promoting such arrangement.



Ecma TC20

(1) Date: March 20, 2007

(2) Place: Ecma International (114 rue de Rhone CH-1204 GENEVA)

Website: <http://www.ecma-international.org/>

(3) Attendees

Mr. Detrez Jean-Luc(Intel,Chair), Mr. John W. Smith,,Mr. Rainer Gehrman(HP),
Mr. Michael O'Dwyer(Apple), Mr. Ton Almering(Philips), Mr. Thomas Jhan(IBM),
Mr. Istvan Sebastyen, Mr. Onno Elzinga, Mr. Jan van den Beld(Ecma), and others

(4) Summary of discussions

Because some of TC20 members were changed we gave briefing on the circumstances of VCCI foundation and missions followed by April 2007 revision of VCCI Technical Requirements regardless of long and intimate relationship with TC20. Then we talked about the MOU with US government which basically went as follows. The MOU is about mutual acceptance of EMC test report between Japan and US. In this scheme testing laboratories accredited by NVLAP or A2LA can bypass VCCI's measuring facilities registration procedure. Conversely, suppliers in Japan can do DoC to FCC with a test report issued by testing laboratories in Japan accredited by accreditation bodies (such as VLAC) which were notified by Japanese government to US government. On this scheme Ecma side commented that in EU it is more realistic to go with global level mutual recognition scheme with ILAC as pivotal facilitator because it is difficult to determine laboratory accreditation bodies in Europe. Questioned if VCCI can accredit testing laboratories of EU we responded that VLAC instead can accredit them.

Other items discussed include the following. Contrary to industry's limit 3 or 6V/m for mobile phone immunity BT is trying to compromise with 10V/m at 900MHz or beyond. There was an opinion that 4% step of frequency must be kept for immunity beyond 1GHz. Counter argument to this was that discussion should continue on testing conditions because fixed frequency intervals will unnecessarily slow down measurement time. CISPR32 is working on a proposal that deals with classification of equipment. Class A equipment are those that satisfy the upper limit specified in Appendix A and Class B equipment are those that satisfy the upper limit specified in Appendix B. Television and wireless equipment shall satisfy the upper limit for Class B equipment.

In the field of TC77, TC20 cast an affirmative on IEC61000-4-7 2nd edition. As to proposed change to the upper limit in IEC61000-3-2, TC20 propose not to change the limit.

Remarks

We think we established a good relationship with EC in this first meeting with them. It is very interesting how market sampling test will be conducted in Europe. We should keep communication channel open with EC to build confidence each other.

Lastly we would like to express our sincere gratitude to Mr. David Imeson, Chairman of the ECNCB, for his kind efforts to serve as our contact with European Commission.