

Wideminds Pte. Ltd.
20, Maxwell Road, #09-17,
Maxwell House, Singapore 069113

From :
Mr Low Wei Yap
Director
Wideminds Pte. Ltd.
20, Maxwell Road, #09-17,
Maxwell House, Singapore 069113

Date 8th July 2016

To :
Ms Woo Yim Leng
Senior Manager (Resource Management & Standards)
Infocomm Development Authority of Singapore
10 Pasir Panjang Road
#10-01 Mapletree Business City
Singapore 117438

RE: Proposed Revision of the IDA EMC and Safety Framework for ICT Equipment

Upon response to Consultation paper issued by Info-Communications Development Authority of Singapore on **PROPOSED REVISION OF THE IDA ELECTROMAGNETIC COMPATIBILITY AND SAFETY FRAMEWORK FOR INFORMATION AND COMMUNICATIONS TECHNOLOGY EQUIPMENT** dated 23th of June 2016. Below are some of the comments base on our company experience.

Question 1

IDA invites views on the position to be taken in not adopting the final draft CISPR 35 for EMS of MME as yet, and aligning with the wider international EMC community. IDA also seeks feedback on any need to adopt the final draft CISPR 35 for EMS along with internationally approved CISPR 32 for EMI, in order to fully streamline the EMC testing methodology for the converged technologies in MME.

Wideminds Comment : Since CISPR 35 is already drafted more than 5 years and have not yet being approved, there might have some changes on CISPR 35 especially many party did not agree with the radiated immunity testing yet. And among the world ,for what we know only Korea started to adopt this standard. (and also the first country). Our view is waiting the International side adopt this standards only Singapore try to adopt this standard as it might have some changes on it.

But for previously IDA only asking for Emission, Which is CISPR 22. Maybe we can still keep it that way and don't adopt CISPR 35

Question 2

IDA seeks views on market readiness in moving to a completely hazard-based approach to evaluating safety of ICT equipment for use in the home environment.

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Wideminds Comment: Hazard based standard are not fully accepted in the industry as this had just started with some big names like HP and also UL. Our view on this is, try to accept both 60950/60065 and also 62368-1. This is practice in some of the neighbor country like Malaysia. Suggest to wait till the migration is fully or majority only switch fully to hazard base safety.

Question 3

It is notable that the EMC standards adopted by IDA precludes other types of electrical/electronic products, suffice to mention that the IDA Radio-communication Regulations¹³ may be enforced should any of these products fail to comply with the relevant IEC/CISPR EMC standards and cause interference. IDA invites any comment in this regard.

Wideminds Comment : EMC compatibility are very important in the world nowadays as more high speed product is create and these will actually Create more issue on compatibility between Electronics products. Each type of product standards have slightly different on level, testing method and also interpretation. Some product like lighting, appliance, medical and TV had a very big differences in EMC testing and requirements. My suggestion is since IDA control radio communication, it is better to follow the radio comm EMC like EN ETSI 301 489 series and FCC Part 15B rather than the product standards. Unless IDA would want to go control product EMC fully, then product standard is a must. (all product EMC in US are park under FCC Part 15B also)

Question 4

IDA invites views on requiring ICT equipment compliance with the IEC/CISPR EMS or immunity standards to complement equipment compliance with the EMI or emission standards, as preamble to the growing influence of the EMF phenomenon in the home environment.

Wideminds Comment : Our company based is EMC consulting and Global product type approval consulting, as a EMC Consulting company we are very aware of EMC/ EMF issue, which is more and more severe. Especially for the end consumer, EMC are something that cannot be seen and hard to understand. So Control it will means that lesser issue in the market and less complain from consumer. (as it might really interfere other appliance and create accident or issue)

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Question 5

IDA invites views and comments on the need to adopt EMC requirements for radio-communication and ancillary equipment in line with the European harmonised EMC standards for radio equipment and services, alongside the requirement to transmit according to the ITU Radio Regulations.

Wideminds Comment : Radio-communication equipment by right should fulfill EN ETSI 301489 series as it control the radio portion of the product to fulfill the EMC performance. This is under RTTE Directive (Currently change to RED Directive) of European requirements. If controlling the end product EMC , it actually more towards the End product performance .. not the Radio performance..

Question 6

IDA seeks feedback on any issue with IDA's 31 March 2017 deadline for cessation of acceptance of EMI measurements performed to CISPR 13 or CISPR 22 standards, noting that this is in sync with the tail-end of the IEC 3-year timeline for withdrawal of CISPR 13 and CISPR 22 standards.

Wideminds Comment : This action can't be avoided as CISPR 13 and CISPR 22 will be succeeded by CISPR 32 by 2017. This is in sync with the IEC time line.. so it is ok..

That's all , Thank you very much for given the opportunity to provide our comment.

Regards,

Mr Low Wei Yap

Director of Wideminds Pte Ltd

Email :weiyap.low@wide-minds.com

Phone : +65-91063069