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Sierra Wireless's Comments on Draft IMDA TS CMT

Sierra Wireless would like to propose that IMDA TS CMT includes a definition of the term *Cellular Mobile Terminal* ("CMT"). The Draft IMDA TS CMT states that "CMTs may include handheld, portable and vehicle-mounted equipment, and RF interface cards and modems". This is not a definition and can be potentially misinterpreted. Some of the RF interface cards, or commonly referred to as RF modules such as the ones shown below, can't be considered CMT and should not be subject to IMDA TS CMT, because they can't transmit/receive without being integrated into a host device. EMC assessment can't be performed on them either, prior to the cards being integrated into a host device. Many manufacturers including Sierra Wireless mount such cards on test jigs and perform compliance testing on the test jig using test antennas. Such cards then get registered with IMDA in Singapore and system integrators simply reference the cards' IMDA registration for their host device, without performing compliance assessment or re-registration with IMDA for the host device even though the host uses a completely different antenna system, which constitutes a Class 2 Modification to say the least.

Since IMDA TS CMT also covers 5G FR2 (mmWave) CMT, it's even more important to remove RF interface cards from CMT because no measurement can be made on such cards at mmWave frequencies.



This is an industry-wide challenge and so far only Australia has got it right. The ACMA (IMDA's counterpart in Australia) specifically excludes the following item from the scope of its regulation

<https://www.legislation.gov.au/Series/F2015L00190>).

An item that is manufactured or imported solely for incorporation into another item and that, before such incorporation, cannot be used to connect to a telecommunications network or to a facility of such a network.

Sierra Wireless sincerely hopes that Singapore will be the second country to have a modern and robust regulation for 5G technologies and beyond.