

21st July 2016

Mr Raymond Lee
Director (Resource Management and Standards)
Infocomm Development Authority of Singapore
10 Pasir Panjang Road
#10-01 Mapletree Business City
Singapore 117438

Dear Director Lee,

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

Sony is pleased feedback on the Proposed Revision of the IDA EMC and Safety Framework for ICT Equipment. Our main concerns are related to IDA subsequent updates to the section on “General Requirements” in Part A of the TS DVB-T2 IRD, based on the decision made from this review of the EMC and safety framework for ICT equipment.

We would like to highlight the following issues.

1) Scope:

Will AC adapters used for AV product subjected to new Safety standard (IEC 62368) and follow below implementation schedule?

Existing Safety Standards	Replacement Safety Standards	Date of Complete Transition
Mandatory Compliance		
IEC 60065 for AV equipment IEC 60950-1 for telecom/ICT equipment	IEC 62368-1 for AV/ICT/telecom equipment	31 March 2019 <small>See Note 1</small>
IEC CISPR 13 for EMI or emissions from AV equipment IEC CISPR 22 for EMI or emission from telecom/ICT equipment	IEC CISPR 32 for MME	31 March 2017 <small>See Note 2</small>
Voluntary Compliance		
IEC CISPR 20 for EMS or immunity testing of AV equipment IEC CISPR 24 or IEC 61000-4 series of standards for immunity testing of telecom/ICT equipment	Final draft IEC CISPR 35 for MME	No IEC timeline for withdrawal of existing CISPR standards

We would like to request spare part/service part to be out of scope, if possible.

2) EMI Test Scope

We would like to confirm if EMI scope for CISPR13/32 with DVB-T2 receivers should be for DVB-T2 signal only. Can you confirm if DVB-T & Analog signal as well are required to be include in scope of CISPR13/32 Test?

3) Implementation date of new Safety standard IEC 62368-1:

We would like to request IDA to consider its implementation date as 20 Jun 2019 in order to in line with the enforcement date of UL/EN 62368-1.

4) Annex C Note 1

Note 1: In the next 3 years, IDA may continue to accept AV and telecom/ICT product safety testing done to IEC 60065 and IEC 60950-1. IDA may also accept evaluation of equipment safety done to IEC 62368-1, so long as manufacturers are able to demonstrate in their reports that safety hazards have been appropriately identified and eliminated.

Can you please confirm the 3 years mentioned in Note 1 refers to:

- i) 3 years from the consultation paper being published, meaning 23 June 2019. Or
- ii) 3 years from date of complete transition mentioned above, meaning 31 Mar 2022?

And, IDA can accept IEC 62368 application before 31 Mar 2019?

5) New EMI Standard IEC CISPR 32

We kindly request IDA to accept EN 55032 standard.

6) Test Lab requirement

Is there any test lab requirement for new Safety standard and new EMI standard?

(Accredited, etc.)

7) General

Propose this draft requirement apply only to new application after implementation date.

No impact and no re-application required for the model approved with existing standard

(Means no impact to current running models)

If you require any clarification on the above letter, Sony can visit IDA offices, if necessary, to discuss these issues further. Alternatively, we can clarify directly via email using the following address, Stephen.Cleary@ap.sony.com .

Thank you.

Yours sincerely,

Stephen Cleary,

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