

25th November 2016

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

Dear Director Lee,

RE: PUBLIC CONSULTATION ON THE REVISION OF THE TECHNICAL SPECIFICATION FOR THE INTEGRATED RECEIVER DECODER FOR USE WITH THE SECOND GENERATION DIGITAL TERRESTRIAL TELEVISION BROADCASTING SYSTEM

Sony is pleased to feedback on the '*PUBLIC CONSULTATION ON THE REVISION OF THE TECHNICAL SPECIFICATION FOR THE INTEGRATED RECEIVER DECODER FOR USE WITH THE SECOND GENERATION DIGITAL TERRESTRIAL TELEVISION BROADCASTING SYSTEM*'. Our main concerns are related to Safety/EMI/EMS. We would like to highlight the following issues:

1. Request to accept different versions of Safety/EMI/EMS assessment standards for DVB-T2.

Sony would like to request IMDA not to mention the version year of each Safety/EMI/EMS assessment standard and to accept different versions of Safety/EMI/EMS standards as long as it is a valid standard version, and has not been deprecated. In this way, the industry has the flexibility to use any valid standard version for assessment.

Below is an extract from Section 2 "References" of the DVB-T2 Technical Standard:

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| [4] | IEC 60065 (Feb 2011) Audio, video and similar electronic apparatus – Safety requirements |
| [5] | IEC 62368-1 ed.2 (2014): Audio/video, information and communication technology equipment – Part 1: Safety requirements |
| [6] | IEC CISPR 32 (2015): Electromagnetic compatibility of multimedia equipment – Emission requirements Note: <u>Validity of these two CISPR emission standards will lapse by 31 March 2017, namely, CISPR 13 (2009) for sound and television broadcast receivers and CISPR 22 (2008) for information technology equipment, in sync with IEC's timeline for replacing them with the CISPR 32 standard.</u> |
| [7] | IEC CISPR 20 (2006): Sound and television broadcast receivers and associated equipment – Immunity characteristics – Limits and methods of measurement |

Example: Above [4] ~~only~~ indicates IEC 60065 (Feb 2011) as Safety assessment standard. However, Sony requests that IMDA accepts any valid IEC 60065 standards, including IEC 60065:2014 as Safety assessment standard for DVB-T2.

2. Request to accept the regional/national standard of IEC CISPR 32 and IEC CISPR 20.

Sony would like to request IMDA to accept the regional/national standard of IEC CISPR 32 (such as the EN 55032, AS/NZ CISPR 32) and of IEC CISPR 20 (such as the EN55020) as an alternative EMI/EMS assessment standard for DVB-T2.

Below is an extract from Section 2 “References” of the DVB-T2 Technical Standard:

- [6] IEC CISPR 32 (2015): Electromagnetic compatibility of multimedia equipment – Emission requirements
Note: Validity of these two CISPR emission standards will lapse by 31 March 2017, namely, CISPR 13 (2009) for sound and television broadcast receivers and CISPR 22 (2008) for information technology equipment, in sync with IEC’s timeline for replacing them with the CISPR 32 standard.
- [7] IEC CISPR 20 (2006): Sound and television broadcast receivers and associated equipment – Immunity characteristics – Limits and methods of measurement

3. Request to have one year transition period after new DVB-T2 technical specification is published.

Sony would like to request IMDA to consider having one year transition period after DVB-T2 technical specification is published so that industry has more time to prepare for DVB-T2 product to comply with new DVB-T2 technical specification.

4. Request only new registration and renewal need to comply with new DVB-T2 technical specification after its transition period end.

Sony would like to request IMDA that existing iDA/IMDA registered-equipment are not required to re-test & re-register in accordance to new DVB-T2 technical specification after the enforcement of new DVB-T2 technical specification.

During transition period, industry can choose to apply either current DVB-T2 technical specification or new DVB-T2 technical specification. Only new registration and renewal are required to comply with new DVB-T2 technical specification after the transition period ends.

If you require any clarifications on the above letter, Sony can visit IMDA offices if necessary, to discuss these issues further. Alternatively, we can clarify directly via email using the email address below.
Thank you.

Yours sincerely,

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