



Supplier's Declaration of Conformity for ICT Regulations

Status, Confidence-building, and Challenges Ahead

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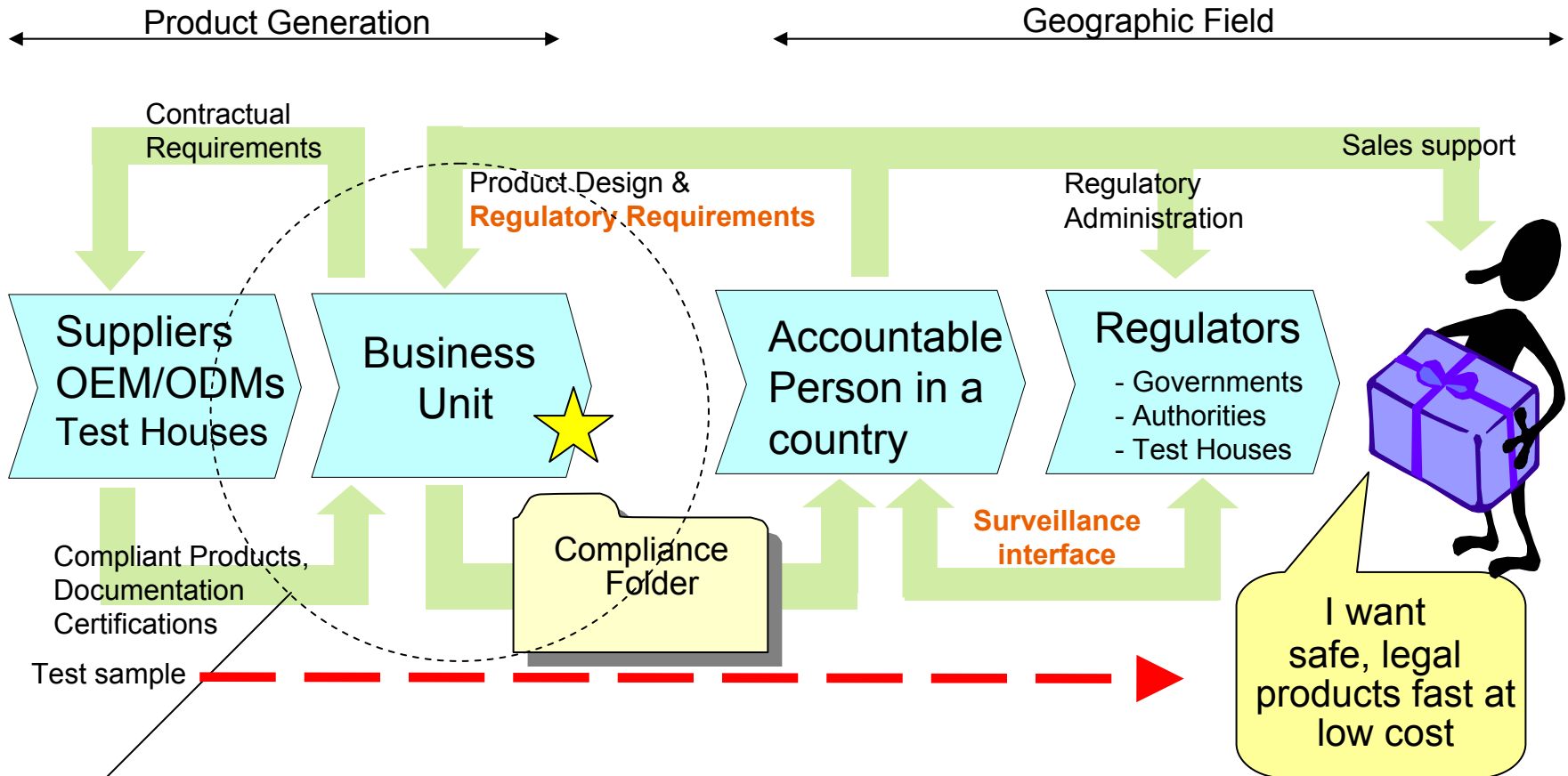


How Companies Manage for Product Regulatory Compliance?

HP Policy on Safe, Legal Products

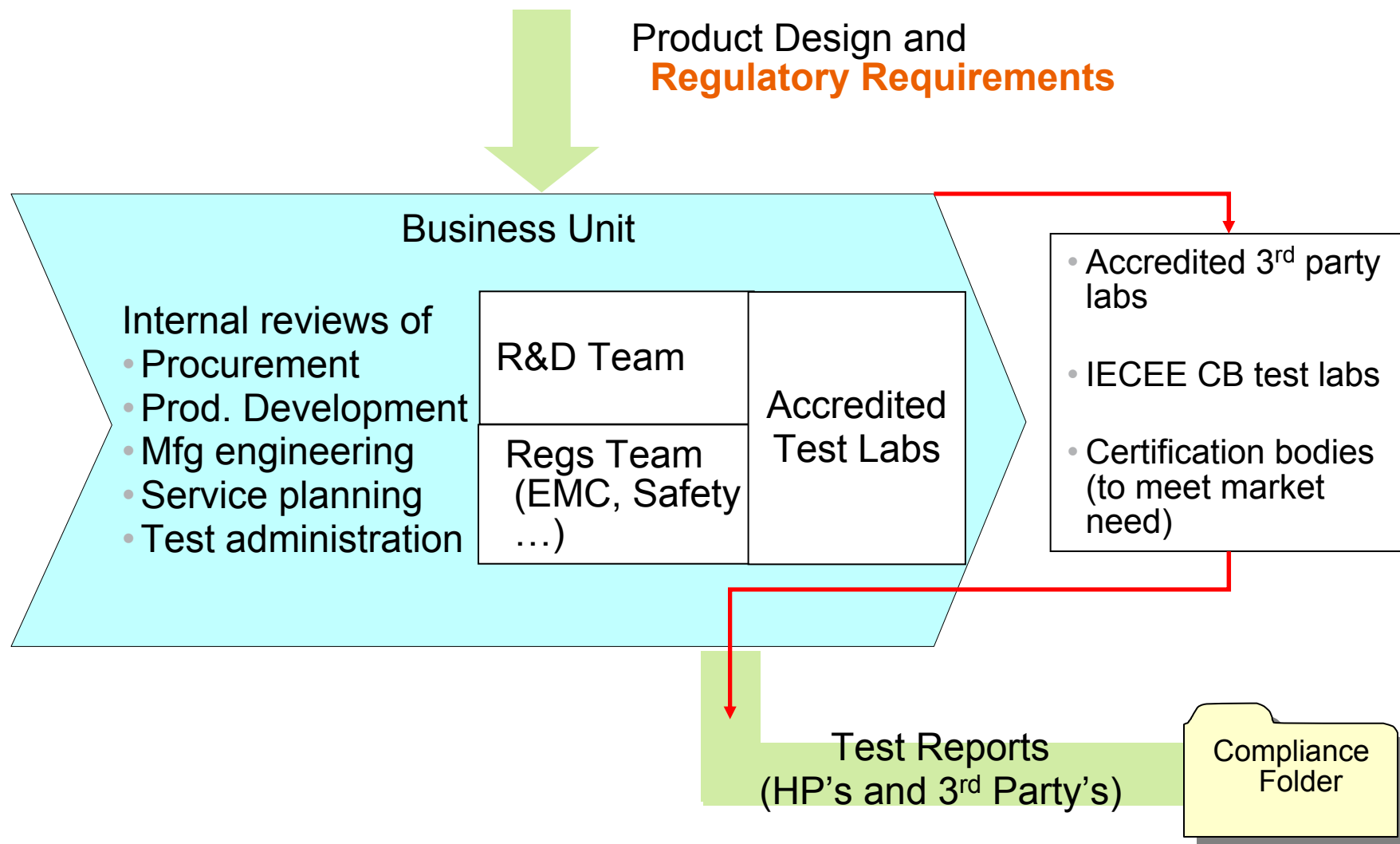
- Ensure compliance with legal requirements for products, operations and services
- Design products to be safe
- Ask suppliers for the same commitment.

Product Regulations at HP



• See detail slide

Product Regulations at HP: Closer Look



Why Regulatory System Should Transition to 1-1SDoC?

One Standard

- Use IEC standards or state equivalency with national standards.
- Eliminate unnecessary deviations and unique requirements.

One Test

- Accepts “one-time” test results conducted in any competent test facility, regardless of the facility's geographic location.

Supplier's Declaration of Conformity

- Accepts SDoC. 3rd-party certification is optional.
- Establishes an effective market surveillance system.

Setting Requirements for Overbuilt Confidence



Requirements for Manufacturer

Design the product to meet int'l standard and legal requirements

Use accredited test lab or IECEE CB

Test product

Submit samples, conduct audits

Use gov't designated test lab

Issue SDoC attestation/Marks/Labels.
Identify accountable party.
Maintain available compliance folder.

Obtain required pre-mkt certificates

Respond to market surveillance

On-going compliance. Re-test & update compliance records for significant changes

Conduct quality system audits, etc.



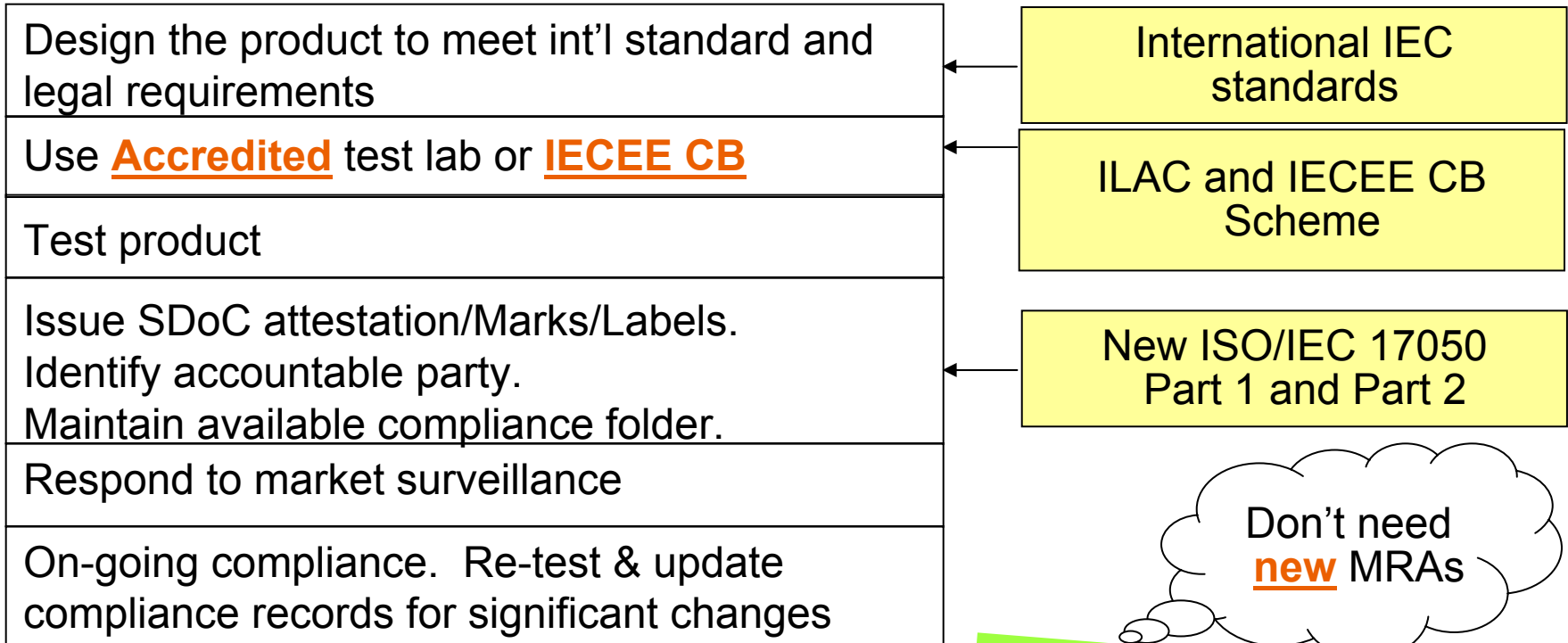
Need Gov-to-Gov MRA

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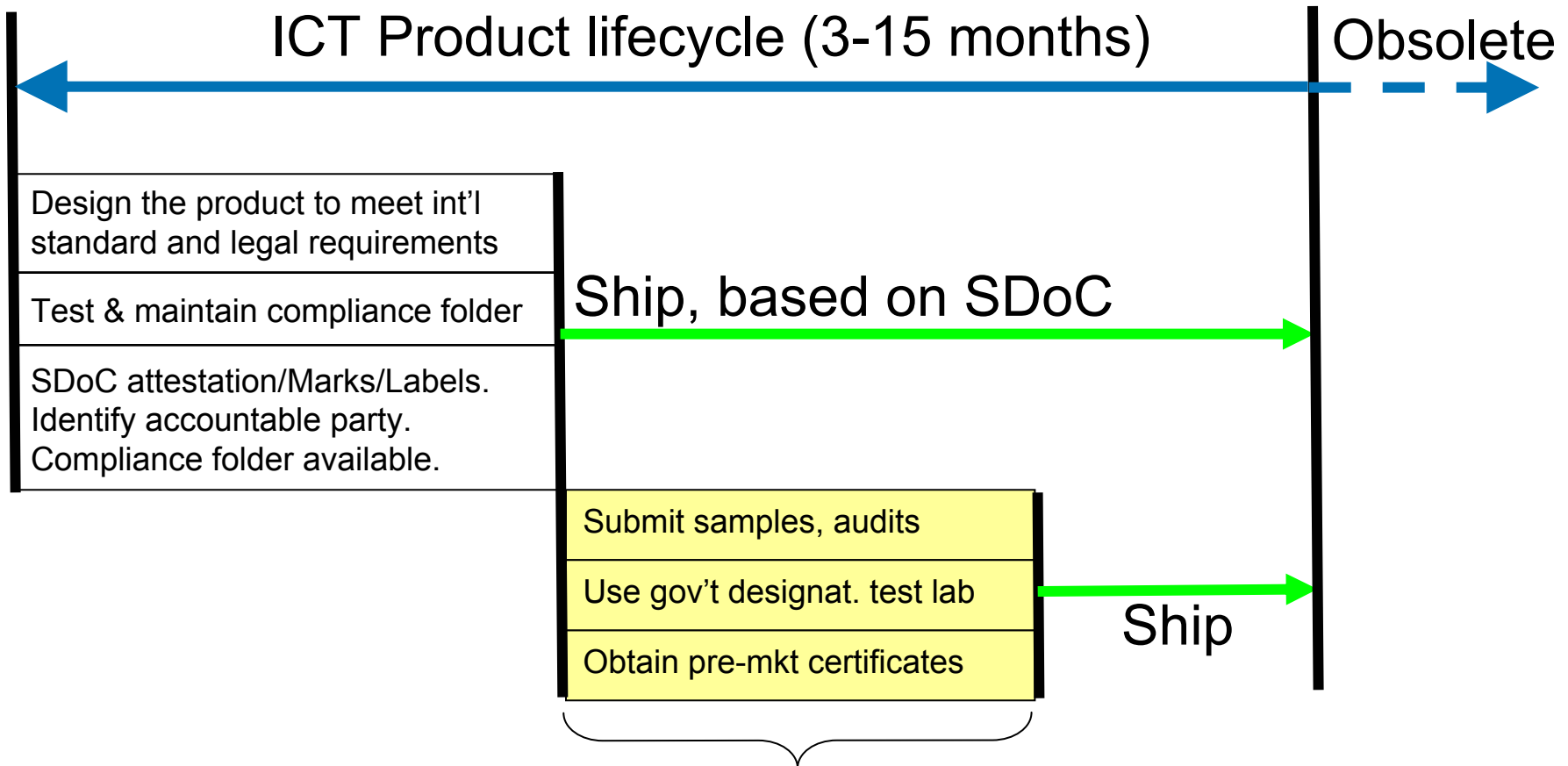
Need Gov-to-Gov MRA

Setting requirements for sufficient confidence

Requirements for Manufacturer



Overbuilt Confidence Delays Time-To-Market



- **For suppliers:** Delay 4-12 weeks, avg. result in (1) delay in revenue or (2) unrecoverable revenue
- **For citizens:** less choice, higher cost products
- **For economy:** impact trade, hurt e-commerce and e-government objectives

Benefits for Regulators from 1-1SDoC and Post-Market Surveillance



- **Public safety can be maintained and even enhanced** for regulators to meet their legitimate policy objectives. Places responsibility rightfully on the supplier. Maintains strong incentives for legal compliance for safe products. SDoC can encourage higher levels of conformity testing and reporting than occurs in third-party assessment
- A **trade-friendly approach** to conformity assurance for **better “portability” of conformity assessment**. The need to negotiate political agreements on mutual recognition becomes moot. Economies are stimulated by freer trade.
- Can be **equally applied to domestic manufacturers and importers**, where “surveillance” and “spot checks” are conducted and penalties are imposed for noncompliance. Focuses limited government resources on the bad actors
- **No discrimination on the basis of the geographic location** of a testing or other conformity assessment body conformity, because, that is in the responsibility of the supplier.

Benefits for Stakeholders from 1-1SDoC and Post-Market Surveillance



For Users/Customers

- Can enjoy products of most recent technology **earlier at lower price**

For Domestic and Global manufacturers

- **Reduce variations** in design and manufacturing
- Provide products at **less cost**.
 - Reduce cost for personnel/resources
 - Reduce testing and certification
- Expect **earlier revenue flow**
 - Reduce barriers to foreign markets

A shared objective
between Regulators and Industry to
provide

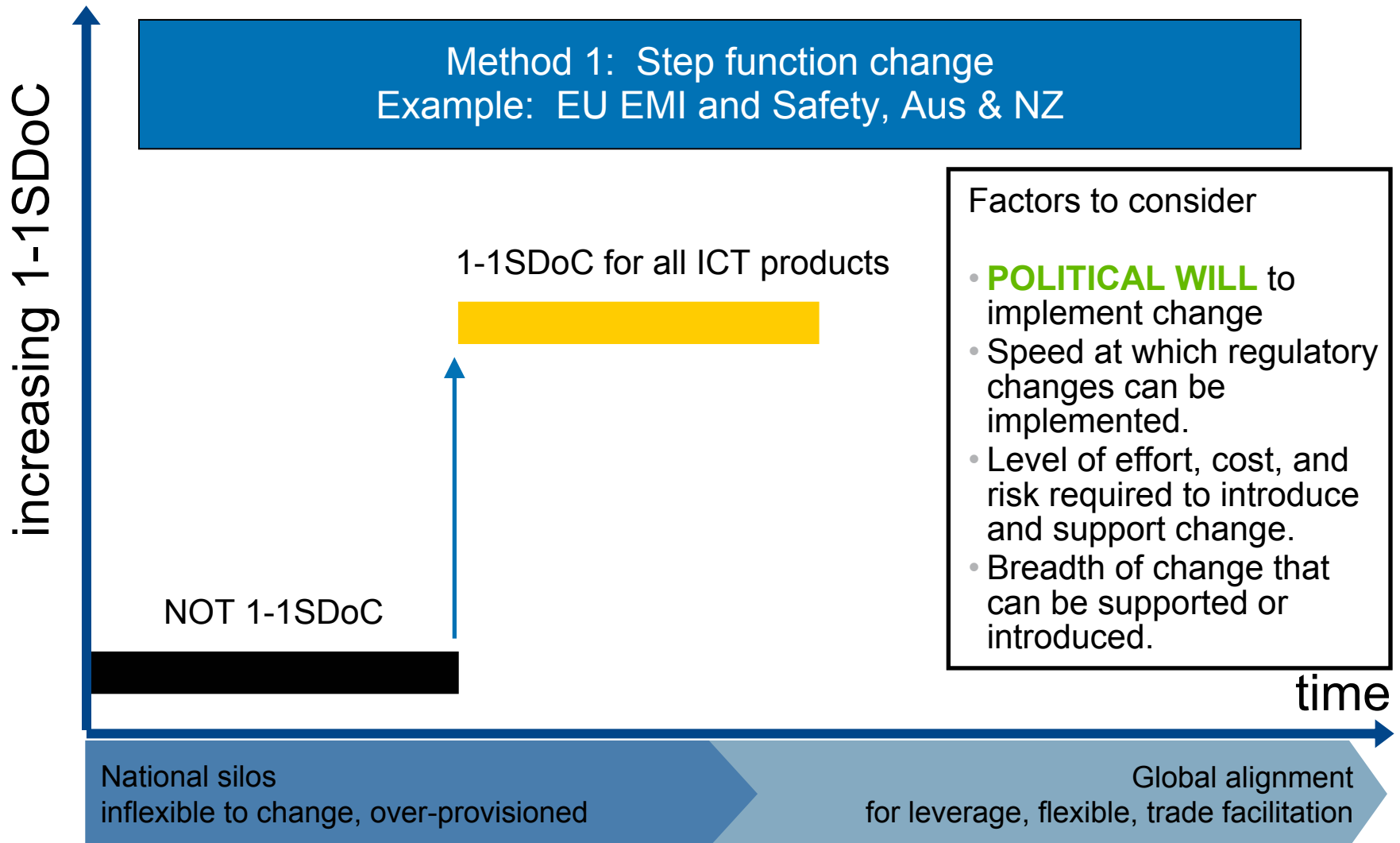
... protection

... and competition of products

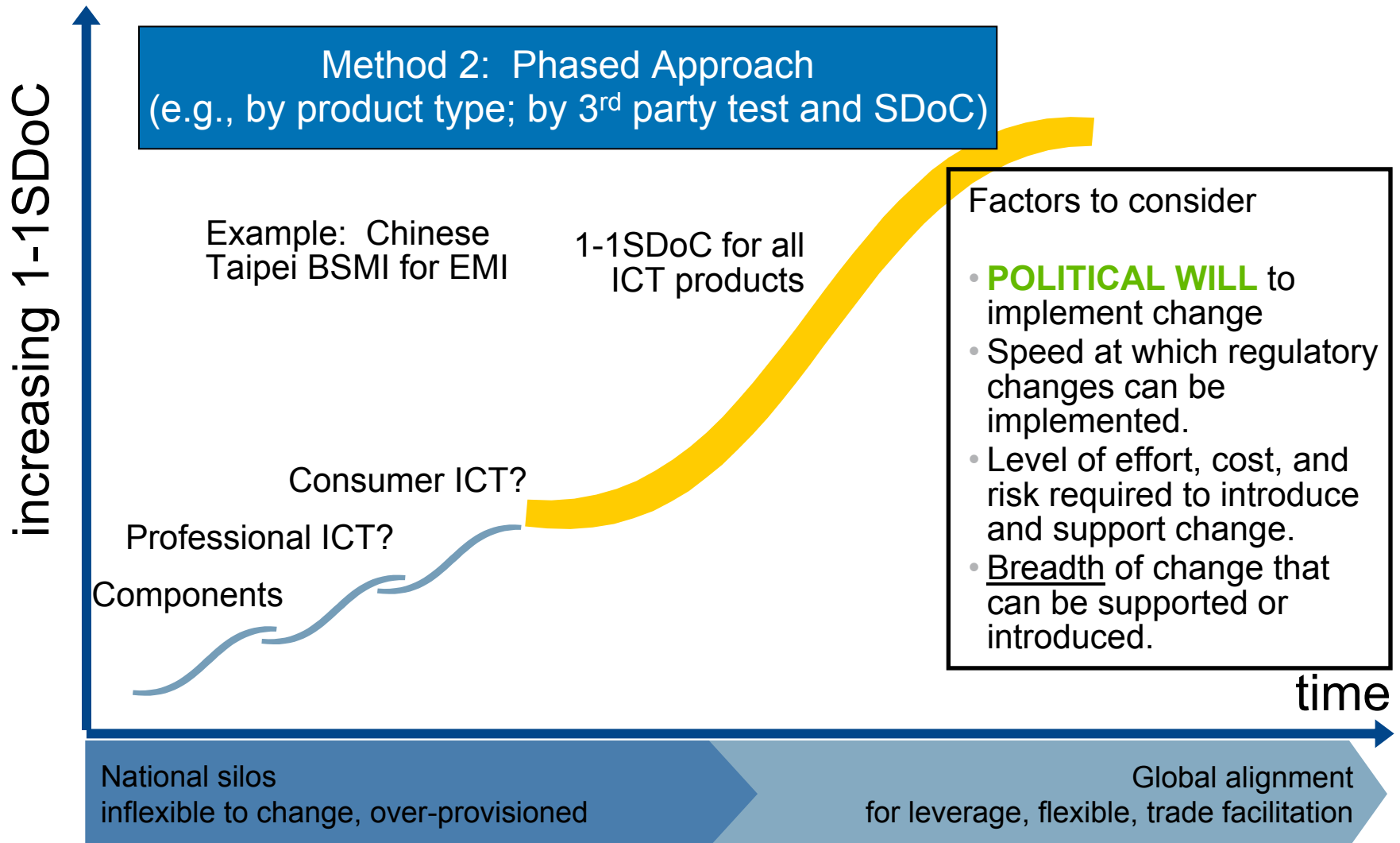
... and growth in today's global economy

for the benefit of their citizens and
industries

Making the regulatory transition to 1-1SDoC: Step Function



Making the Regulatory Transition to 1-1SDoC: Phased Approach







ICT Product Safety & EMI Regulatory Status (as of 09/04)



	Safety		EMC	
	Std	CA	Std	CA
Australia	Green	Green	Green	Green
Brunei	White	White	White	White
Darussalam	White	White	White	White
Canada	Green	Red	Green	Green
Chile	White	White	White	White
PRC	Green	Red	Green	Red
HK, China	White	White	White	White
Indonesia	White	White	White	White
Japan	Green	Red	Green	Green
Russia	Green	Red	Green	Red
Rep of Korea	Green	Red	Green	Red
Malaysia	White	White	White	White
Mexico	Red	Red	Red/White	Red/White
New Zealand	Green	Green	Green	Green
Papua New Guinea	White	White	White	White
Philippines	White	White	White	White
Singapore	Green	Red	White	White
Peru	White	White	White	White
Chinese Taipei	Green/White	Red/White	Green	Red
Thailand	White	White	Red/White	Red/White
US	Green	Red	Green	Green
Viet Nam	White	White	White	White

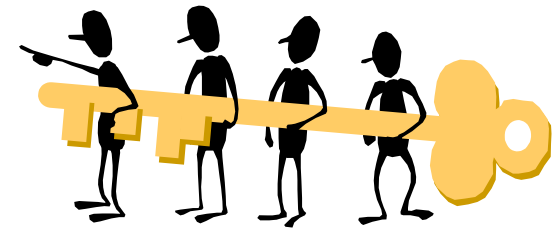
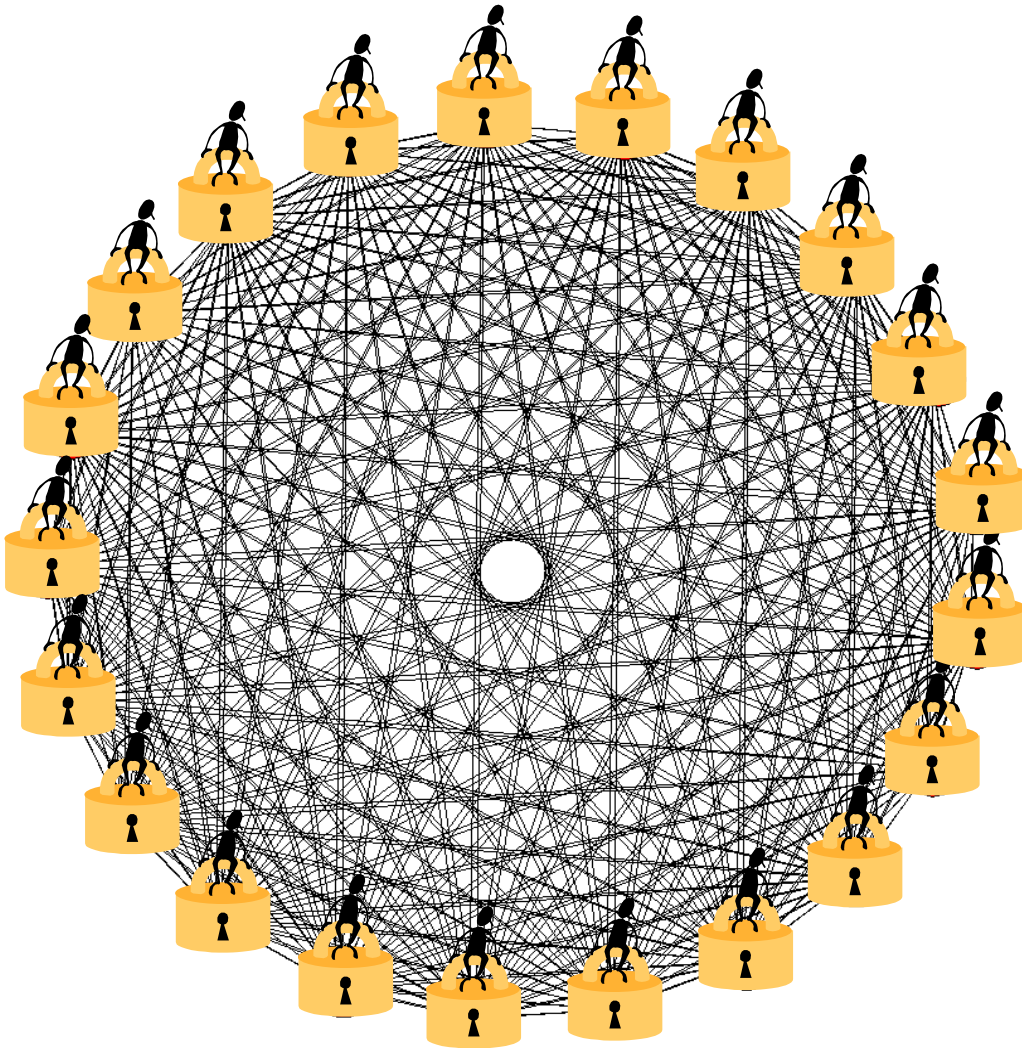
	Safety		EMC	
	Std	CA	Std	CA
Argentina	Green	Red	White	White
Austria	Green	Green	Green	Green
Belarus	Green	Red	Green	Red
Belgium	Green	Green	Green	Green
Bosnia-Herzegovina	Red/White	Red/White	Red/White	Red/White
Bulgaria	Green	Green	Green	Green
Croatia	Green	Red	Green	Red
Cyprus	Green	Green	Green	Green
Czech Republic	Green	Green	Green	Green
Denmark	Green	Green	Green	Green
Egypt	Green	Green	Green	Green
Estonia	Green	Green	Green	Green
Finland	Green	Green	Green	Green
France	Green	Green	Green	Green
Germany	Green	Green	Green	Green
Greece	Green	Green	Green	Green
Hungary	Green	Green	Green	Green
Iceland	Green	Green	Green	Green
Ireland	Green	Green	Green	Green
Israel	Green	Green	Green	Green
Italy	Green	Green	Green	Green
Jordan	Green	Red	Green	Red
Kazakhstan	Green	Red	Green	Red
Latvia	Green	Green	Green	Green
Liechtenstein	Green	Green	Green	Green
Lithuania	Green	Green	Green	Green
Luxemburg	Green	Green	Green	Green
Macedonia	Green/White	Red/White	Green/White	Red/White

-  Ref. Int'l Standards OR post-market CA
-  Ref. unique standards, OR pre-mkt CA
-  No requirements
-  Pending requirements

	Safety		EMC	
	Std	CA	Std	CA
Malta	Green	Green	Green	Green
Moldova	Green	Red	Green	Red
Morocco	Green	Green	Green	Green
Netherlands	Green	Green	Green	Green
Norway	Green	Green	Green	Green
Poland	Green	Green	Green	Green
Portugal	Green	Green	Green	Green
Romania	Green	Green	Green	Green
Saudi Arabia	Green	Red	Green	Red
Serbia & Montenegro	Green/White	Red/White	Green/White	Red/White
Slovakia	Green	Green	Green	Green
Slovenia	Green	Green	Green	Green
Spain	Green	Green	Green	Green
South Africa	Green	Red	Green	Red
Sweden	Green	Green	Green	Green
Switzerland	Green	Green	Green	Green
Tunisia	Green	Green	Green	Green
Turkey	Green	Green	Green	Green
Ukraine	Green	Red	Green	Red
United Kingdom	Green	Green	Green	Green
Uzbekistan	Green	Red	Green	Red

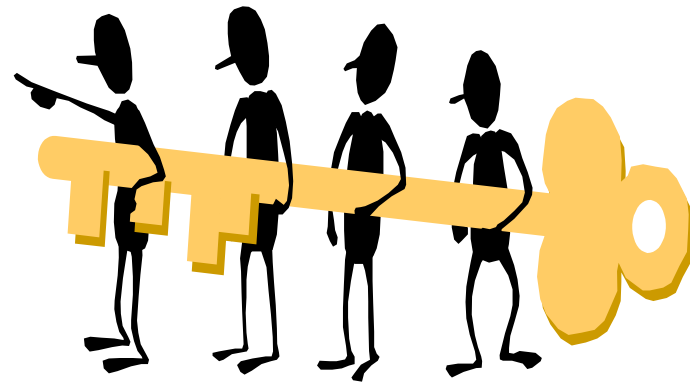
Bilateral Agreement Model - MRA

- Governmental
- High-cost model
- Complex and redundant
- Mistrust, Lock-in
- Burdens domestic and foreign manufacturers



bilateral agreements $n(n-1)/2$
 n = # countries with unique
regulatory systems

1-1 SDoC Model – It's Your Choice!



Lowest-cost model for safe, legal products to market

Summary

- **1-1SDoC can be successfully applied for ICT EMI and safety regulations** (based on experience in regions and countries).
- **Manufacturers will obtain certification for market reasons**, even if no longer mandated by regulation
- **“Over-built” regulatory systems burden everyone:** regulators, consumers and manufacturers
- **Political will** is the biggest hurdle to move toward 11SDoC
- Introduce 1-1SDoC by a **STEP Function** or a **PHASED Approach**
- Regulators can have **confidence in SDoC** by “accreditation” or “CB peer assessment” of test labs, ISO/IEC 17050 standards for SDoC and supporting documentation, and education and surveillance