

TED WARREN'S SURVIVAL GUIDE TO THE RTTE DIRECTIVE

The RTTE directive came into force on April 8, 2000 and radically changed the route to market for telecommunications and radio equipment. The type approvals regime has been replaced with a process of certification and self-declaration applicable to all telecommunications and radio equipment within the scope of the directive.

So what equipment is affected?

All wired and wireless telecommunications equipment, and all radio equipment, with the exception of:-

- Equipment used for public / national security
- Amateur radio equipment
- Marine equipment (covered by 96/98/EC)
- Cabling and wiring
- Broadcast radio receivers
- Civil aviation and Air Traffic Control equipment (covered by 3922/91 and 93/65/EC)

Refer to the RTTE directive Article 1.4, 1.5 and Annex 1 for more detail of excluded equipment.

So my equipment is covered by the directive, what next?

Decide which of the following three categories applies to your equipment.

1. Wired telecoms equipment with no radio interface or facilities
2. Equipment using radio, which is entirely covered by harmonised standards
3. Equipment using radio which is not entirely covered by harmonised standards

New standards for specific types of radio equipment are being developed reasonably quickly, and once agreed, are harmonised across Europe by publication in the official journal of the European Communities. This causes a gradual move of equipment from category 3 to category 2.

What are the certification processes for each category?

The certification process is detailed in the Directive. It will depend entirely on the category into which the equipment falls.

Category 1 - Wired Telecom Equipment

- a. Confirm your equipment meets the requirements of the directive. (Test for compliance with essential requirements).
- b. Create a technical file covering the design, manufacture and operation of the product.
- c. Produce and sign a Declaration of Conformity (DoC). It is recommended that this should be in accordance with EN45014.
- d. Affix the CE mark. Supply a copy of the DoC with every product, or a note stating where the DoC can be obtained.
- e. Keep the technical file and DoC for at least 10 years after the last product is placed on the market.

The process for this is described in Annex II of the RTTE directive. If the design is changed, the technical file must be updated and a new DoC produced and signed.

Category 2 - Radio Equipment covered by Harmonised Standards.

- a. Identify whether the frequencies your equipment will use have been made available for use in all European countries. Frequencies are harmonised by ERC decisions, which are then adopted into the national law of each country. Not all ERC decisions result in harmonised frequency allocations. The ERO website gives details.
- b. If the frequency is not harmonised, contact the Spectrum Management Authority (for example the Radiocommunications Agency in the UK) of each Member State where you intend to market the product, and give notification in writing that you intend to place the equipment on their market. See the RTTE directive clause 6.4 for the information to be included. This action is not required where the frequency band is harmonised throughout the whole of the European Union. At least four weeks notice must be given.
- c. Identify all the harmonised standards to which the product must conform. Note! It is possible for a product to be covered by harmonised standards, even if it is not in a harmonised frequency band.
- d. Identify the minimum tests to be appended to the TCF. This is often identified in the harmonised standards which cover the product.
- e. Produce a TCF in accordance with Annex II.
- f. Perform tests either in-house or by a third party (this does not have to be done by a Notified Body).
- g. Produce a DoC in accordance with Annex II, and include a statement that the tests identified in the harmonised standards have been carried out, and that the equipment meets the essential requirements.
- h. Affix the CE mark. Supply a copy of the DoC with each product, or a note stating where the DoC can be obtained.
- i. If the product uses frequencies which are not available for use in all countries, affix the alert symbol after the notified body number.
- j. Keep the DoC for a minimum of 10 Years after the last product was placed on the market.

Category 3 - Radio Equipment not fully covered by Harmonised Standards.

- a. Contact the Spectrum Management Authority (the Radiocommunications Agency in the UK) of each Member State where you intend to market the product, and give notification in writing that you intend to place the equipment on their market. See the RTTE directive clause 6.4 for the information to be included. This action is not required where the frequency band is harmonised throughout the whole of the European Union. At least four weeks notice must be given.
- b. Identify all the essential requirements to which the product must conform.
- c. Contact the Notified Body of your choice to identify the minimum tests to be appended to the TCF.
- d. Produce a TCF in accordance with Annex II.
- e. Perform tests either in-house or by a third party (this does not have to be done by a Notified Body).
- f. Submit the TCF to your chosen notified body, who will review the file and give an opinion within four weeks as to whether conformity with the directive has been demonstrated.
- g. Produce a DoC in accordance with Annex II, and include a statement that the tests identified by the Notified Body have been carried out, and that the equipment meets the essential requirements.
- h. Affix the CE mark and the Notified Body number. Supply a copy of the DoC with each product.
- i. If the product uses non-harmonised frequencies, affix the alert symbol after the Notified Body number.
- j. Keep the DoC for a minimum of 10 Years after the last product was placed on the market.

What pitfalls are there?

Quite a few, and they are still surfacing.

- a. Some countries make money and boost employment by enforcement of the EMC directive and the RTTE directive. Fixed penalties can be applied for even trivial of documentation errors.
- b. It is illegal to place radio equipment operating on non-harmonised frequencies on the market of an EU member state without giving the due notification to the appropriate Spectrum Management Authority. The Manufacturer is liable, or his authorised representative in the EU.
- c. There is nothing now except market forces to stop the fragmentation of the wired telecoms market. In the absence of any performance standards, there is a fear that major distributors may impose their own (but differing) requirements.

How can GTL help?

GTL offer a compliance management service. By identifying the optimum route, and then performing or managing all the necessary steps to implement it, we take the uncertainty out of the compliance process. This enables you to place your product on the market with confidence.