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| **Radiocommunication Advisory Group Geneva, 25-27 June 2012** |  |
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|  | **Document RAG12-1/2-E** |
| **25 May 2012** |
| **Original: English** |

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| **United States of America** |
| VIEWS ON CONFORMITY ASSESSMENT AND INTEROPERABILITY IN THE ITU-R |

# Introduction

RA-12 Resolution ITU-R 62 instructs the Director of the BR to prepare a report on the progress as to understanding of the unique Conformity Assessments and Interoperability (CA&I) issues of developing countries. As such the BR is instructed to gather input on the issue from administrations and sector members.

1. **Background**

Since WTSA Resolution 76 was adopted in 2008, the issue of CA&I has been discussed numerous times in TSAG and other forums. Throughout the process, the United States has joined with others in seeking a clear understanding of the issues and desiring to ensure that any solution developed will, in fact, address those issues.

Recently, the United States International Telecommunication Union Association (USITUA) held a workshop on the issues of CA&I as part of an effort to further gain knowledge on the issue as well as to discuss the possible merits of the proposed solutions that were being discussed in the TSAG. The conclusion at the end of the USITUA workshop was that there was still no clear understanding of the exact nature of the issues facing developing countries, and whether testing for compliance with ITU-T Recommendations will solve problems such as counterfeiting of equipment or receiving equipment of poor quality. The general conclusion of the USITUA workshop was that any ITU CA&I program was unlikely to solve such issues as they are understood by participants in the USITUA workshop. Rather, as the United States has argued before, conformance testing when needed is best left to expert bodies established for that purpose,[[1]](#footnote-1) and an issue such as counterfeiting is a matter for law enforcement. Further, because the ITU-T has yet to produce a viable business plan for a CA&I program as previously instructed[[2]](#footnote-2), it is inappropriate to expend the additional resources required to involve the membership of the ITU-R or the staff of the BR.

Despite the view that was expressed at the June RAG meeting that the program was still too premature for the Radiocommunication Sector to address, at the Radiocommunication Assembly 2012, Resolution ITU-R 62 was adopted instructing the Director of the BR to prepare a report on the status of the understanding of the issues that developing countries are encountering. Based on discussions at the USITUA workshop on CA&I, the United States has found no evidence supporting the notion that ITU-R participation in an ITU-T CA&I program would effectively address any problems related to counterfeiting or equipment quality that may exist in either developing or developed countries.

**3 Discussion**

The United States fully supports addressing the needs of developing countries and seeks to ensure the effectiveness of any solution by first clearly identifying the problems being encountered by developing countries in regards to Conformity Assessment and Interoperability.

At the recent ITU-T Study Group 5 meetings, the draft report by the consultant hired to develop the business plan was discussed. It is the understanding of the United States that the consultant firm hired to prepare the business plan raised some questions and concerns regarding the ITU-T program, including:

1. That in the initial concept the overall program is too complicated to proceed forward without changes.
2. The program may very well need to be broken down to more a basic program to start; with work being done in limited study groups.

**4 Proposal**

It is the view of the United States that it is unwise to proceed with creating a CA&I initiative in the ITU-R, particularly since the ITU-T has yet to fulfil its CA&I mandate. Moreover, based on the ITU consultant’s draft report, it appears that the ITU-T CA&I program may have to be re-thought and re-designed. It would be wise to learn from the ITU-T’s experience before considering any involvement by the ITU-R.

As stated previously, the United States remains unclear on how the stated issues that are of concern to the developing countries would be solved by an ITU CA&I program. Until such time as there is clarity regarding the issues, and until such time as ITU CA&I proponents are able to clearly articulate how such a program addresses problems expressed by developing countries, the United States proposes that the Director of the BR report to the TSB that it is premature to address CA&I issues in the ITU-R.

In view of continuing concerns, the United States also proposes that the Director, BR report that issues of conformity assessment are best addressed by experts in the field of compliance testing and that issues on interoperability are best addressed by the relevant standards groups, industry associations, service providers or manufacturers depending on the specific interoperability issues, and whether markets dictate that interoperability is necessary.

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1. Implementing additional conformance testing regimes would translate to considerable additional equipment costs. [↑](#footnote-ref-1)
2. See [Resolution 177 (Guadalajara, 2010)](http://www.itu.int/council/Basic-Texts/ResDecRec-PP10-e.doc#res177) *instructs* 4 and [Resolution 76 (Johannesburg, 2008)](http://www.itu.int/dms_pub/itu-t/opb/res/T-RES-T.76-2008-PDF-E.pdf) *instructs* 4. [↑](#footnote-ref-2)