
DRAFT TYPE APPROVAL GUIDELINES

For Radio Equipment and Telecommunications

Terminal Equipment

SUMMARY OF RESPONSES TO THE CONSULTATION DOCUMENT

Executive Summary

This consultation is a follow up to the public consultation on the draft Type Approval Policy launched by ictQATAR on 26 April 2009, which then lead to the release of the final Type Approval Policy on 30 August 2009.

The report provides a summary of the responses to the consultation document on the Type Approval Guidelines. The purpose of this consultation was to ensure that the new Type Approval regime is one that has the support of all stakeholders involved in the run up to the planned opening up of the market for importation and commercialization of RTTE. In an effort to collect as many responses as possible to ensure that all of the aspects of type approval have been covered, this document was sent to national stakeholders, international manufactures, international consultants, as well as government entities. A list of the comments received from these respondents follows.

Purpose of this document:

1. To summarize the review of the recommendations and additional comments received from respondents to the consultation on Type Approval Guidelines.
2. Provide ictQATAR's response to the key comments received.
3. To be used for discussion of the responses to the recommendations received by the respondents, and to agree on the final position of ictQATAR.

Respondents:

1. Qtel
2. IBM (World Wide Homologation & Type Approval-France)
3. Cisco Systems (Dubai)
4. Alcatel-Lucent France (Qatar Branch)
5. Eastern Technology Systems (distributor of Motorola in Qatar)
6. TUV Rheinland (Japan)
7. AISIN AW Co. (Japan)
8. Al Yah Satellite Communications Co. (Dubai)

9. ViaSat Inc. (USA)
10. Qsat Communications (Qatar)
11. Denso Corporation (Japan)
12. Visteon Ltd. (Japan)
13. Tokai Rika Co. (Japan)
14. Pacific Industrial (Japan)
15. AISIN SEIKI Co. (Japan)
16. Pioneer Corporation (Japan)
17. Fujitsu Ten Limited (Japan)
18. TRW Automotive (USA)

Tables

Table 1: Summary of the recommendations and justifications received from respondents and ictQATAR's response.

Table 2: Summary of the additional comments received from respondents and ictQATAR's response.

Table 1: Summary of Recommendations & Justifications

Question	Recommendations	Justification	ictQATAR's Comments
1. Technical Standards Recognized by ictQATAR	Qtel submits that tests against a defined standard are one way to evaluate conformity, but should not be the only way to demonstrate such compliance.	Qtel suggests adding a list of pre-defined essential requirements in addition to the list of standards. It also highlights the significance of the list being indicative but not exhaustive.	The list of essential requirements is already included within the scope of the list of standards recognized by ictQATAR.
	IBM & Cisco suggest adding the harmonized EN 300 328 standard to the list of reference standards of conformity for ISM, WLAN & Bluetooth devices.	IBM declares that the standard is the European harmonized reference standard used for conformity of WLAN & Bluetooth Equipment.	ictQATAR would make the necessary amendments on the upcoming published guidelines. Reference EN 300 328 to be added to the list of reference standards for ISM, WLAN & Bluetooth devices.
	Cisco suggests increasing the maximum allowed EIRP to be 100mW (20 dBm) for WLAN equipment operating in the 2.4GHz band.		ictQATAR would only consider a maximum of 100mW for WLAN equipment. However, this does not apply to Bluetooth and other ISM equipment.
	Denso & Pioneer suggest adding the reference "FCC Part 15 & EN 300 328" as a standard of conformity for ISM, WLAN, & Bluetooth instead of the EN 300 440 reference.	Denso & Pioneer state that the "EN 300 440" reference is a standard for conformity of GPS & Intrusion Sensor equipment.	EN 300 328 standard shall be included, which will cover this area.

	<p>1. ViaSat & Yahsat strongly suggest adding the standards adopted for Aeronautical & Maritime Mobile Satellite Services which include:</p> <ul style="list-style-type: none"> - EN 302 186 Harmonized EN for satellite mobile Aircraft Earth Stations (AESs) operating in the 11/12/14 GHz frequency bands covering essential requirements under article 3.2 of the R&TTE directive. - EN 302 340- Harmonized EN for satellite Earth Stations on board Vessels (ESVs) operating in the 11/12/14 GHz frequency bands allocated to the Fixed Satellite Services (FSS) covering essential requirements under article 3.2 of the R&TTE directive. <p>2. ViaSat & Yahsat also suggest adding the Ka-band transmit frequencies 27.5-29.5 GHz & 29.5-30.0 GHz which are specified in reference standards EN 301 360 & EN 301 459.</p>	<p>ViaSat &Yahsat believe that these standards would help facilitate the global authorization and implementation of Aeronautical & Maritime Mobile Satellite Services.</p>	<p>The following suggested harmonized standards and specified Ka-band would be considered and reviewed by ictQATAR:</p> <ul style="list-style-type: none"> - EN 302 186 - EN 302 340 - EN 301 360 - EN 301 459
	<p>Yahsat also suggests adding the following information:</p> <ul style="list-style-type: none"> - 3.4-3.625 GHz (space-to-Earth, unplanned FSS). - 4.5-4.8 GHz (space-to-Earth, planned FSS). - 6.425-6.725 GHz (Earth-to-space, unplanned FSS). - 12.75-13.25 GHz (Earth-to-space, planned FSS). - Amending the freq. band 13.75-14.5 GHz 	<p>Yahsat states that these frequency allocations were declared in section IV of Article 5 of the ITU-RR.</p>	<p>ictQATAR would consider the suggested frequency bands in line with Qatar's National Frequency Allocation Plan (NFAP).</p>

	to 13.75-14.0 GHz.		
	<ol style="list-style-type: none"> 1. TRW suggests including the type of system with the reference standards stipulated in the table. 2. TRW also suggests only including the reference standards with the type of system, while excluding the Maximum Field Strength/RF output power. 	<p>TRW believes that stating the reference standard with the type of system would clearly indicate that the criteria should be applied to the specific system (equipment). TRW also believes that these limits might be in conflict with the reference standards, as the guidelines and revisions of each might not agree.</p>	<p>ictQATAR's aim of generalizing the type of applications/systems is for the fact that these systems could operate on one or more of the highlighted and authorized frequency bands. ictQATAR may, however, develop more specific criteria for reference standards at a later stage. Also, ictQATAR believes that the maximum RF output must be mentioned with the corresponding frequencies in order to limit the use of high RF power devices that could cause interference to other systems operating on the same bands.</p>
	AISIN AW requests that the information on the "technical standards" of the "Draft Type Approval Guidelines" should be in accordance with the "technical requirements" of the "Class License for Short Range Devices (SRDs)" which has already been published in 30 May,2010.	AISIN AW believes that some of the differences between the "technical standards" and the "technical requirements" might confuse manufacturers.	In cases of a conflict, technical requirements under the guidelines will prevail.
	<ol style="list-style-type: none"> 1. Eastern Technology Systems (ETS) suggests adding ATEX (EXplosive Atmospheres) directive as one of the recognized international bodies. 2. ETS also suggests adding FM (Factory Mutual) certification as one of the standards for certifying Intrinsically Safe radios. 	ETS believes that the ATEX standard is now widely used as a standard for radios.	ictQATAR will consider adding ATEX directive to the list of recognized International Bodies.
	ETS suggests adding the 136-174 MHz frequency range as one of the bands used for "Private Mobile Radio (PMR)".	ETS states that many users particularly at off-shore are using PMRs in the highlighted bands.	Frequency band (s) adoption shall be in line with the National Frequency Allocation Plan (NFAP) of Qatar.

<p>2. Documentation required for the Simplified & Standard Type Approval Process</p>	<p>Cisco suggests that the Simplified Type Approval process should be amended to include all RTTE carrying a CE mark.</p>	<ol style="list-style-type: none"> 1. Cisco states that TRA (UAE) is only requesting a CE Manufacturer Declaration of Conformity (DoC) when applying for type approval of RTTE, which is followed for all CE, marked RTTE. While TRA (Bahrain) considers CE marked equipment directly approved by the regulations. Cisco therefore believes that if these regulatory bodies are recognized by ictQATAR, then ictQATAR should adopt the same principles in this regard. 2. Cisco believes that since ictQATAR has drafted its standards according to the international best practices, and as Qatar is considered as an ITU Region 1 country, a CE marked RTTE showing compliance with all applicable ETSI standards, should prove compliance as well with the local standards imposed by this regulation. 	<p>Essentially this is followed. However, there are some areas which would be decided according to Qatar's NFAP.</p>
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	<ol style="list-style-type: none"> 1. Cisco suggests eliminating the line containing Country of Origin on the application form under the Standard Type Approval Process. 2. Cisco also suggests simplifying the layout of the application form in Appendix B- Standard Type Approval Process, by creating a new section entitled "Technical details for Radio Equipment ONLY" which includes all the required information for radio equipment (from frequency range-to-equipment license requirement). 	<ol style="list-style-type: none"> 1. Cisco declares that being a major manufacturer of RTTE, they have different manufacturing locations, and therefore the same product might be manufactured in a different country every time. 	<p>The information required in the application forms are for the purpose of examination and for data collection. Also, ictQATAR believes it is impractical to develop an application form for each type of equipment separately. The applicant would be responsible to indicate which detail applies to their proposed device.</p>
	<ol style="list-style-type: none"> 1. ETS states that the required documentation is appropriate, but in their opinion is impractical. In their opinion, the information on "Certification of Compliance issued by a NRA or a Conformity Assessment Body" required for the application form under the simplified Type Approval Process (Appendix A) is not practical. 2. ETS also believes that the form for the Standard Type Approval process (Appendix B) is complicated and impractical to fill. 	<ol style="list-style-type: none"> 1. ETS believes that the information about the certification of conformity of a product would be mentioned on the specification sheet or the brochure of the product itself showing compliance of the device. 2. ETS states that most of the products that they purchase are off-the-shelf by the manufacturer and getting a test report from them is not practical. 	<p>ictQATAR believes that the information on Certificate of Compliance is important to ensure that the device provided by the manufacturer is certified and complies with the recognized relevant standards.</p>

3. Documentation required for the Technical Construction File	TRW suggests allowing the characters on the label (ictQATAR label) to be as small as possible to fit on the equipment.	TRW states that some systems/devices are very small and the amount of information required for the labeling on the equipment would not be readable if applied. It also believes that paper/plastic labels are not practical for equipment that would be molded with color after labeling. TRW also states that exemption should be allowed to place most or all of the information in the owner's manual.	ictQATAR has already highlighted on the Type Approval Guidelines that if it is not feasible to place the label on the device "an alternative method of displaying the required label may be used if approved by ictQATAR in writing." [Refer to: Section 8 - paragraph (d) & (e)]. It also suggests that the label may be affixed in the packaging and/or in the user manual, but it is not mandatory unless for reasons of size or other design features the RTTE itself cannot be marked.
	ETS believes that some of the information required on the technical construction file is impractical; for example getting test reports and certifications of compliance, instead they suggest adding flexibility to the required documentation for the technical construction file.		ictQATAR believes that the documents required for the Technical Construction File are comprehensive and are in line with the best practice methods used for Type Approval processing.
	Qsat suggests omitting item 7; circuit diagrams, PCB layouts, parts lists & construction information for those parts of the RTTE which have a direct impact on compliance with the technical requirements; of the documentation required for the Technical Construction File.	Qsat believes that this information would be difficult to provide & will contain proprietary information which many manufacturers will not be comfortable providing.	The information required in the application forms are for the purpose of examination. However, some details will not apply to all devices/systems. ictQATAR would advise applicants to indicate in writing that for the purpose of their rights of information disclosure, they would prefer that these information not to be made public.

	<p>Cisco states that the documentation required for the TCF is a bit complex and a bit time consuming for the manufacturer, they also suggest removing the:</p> <ol style="list-style-type: none"> 1. Technical documentation of RTTE, 2. Circuit Diagrams, PCB layouts & parts list, 3. Label placed on the RTTE" from the documentation required for the TCF. 	<p>Cisco believes that point 1 is already mentioned in the application form and should not be required anymore in the TCF, point 2 to be simplified to include only a circuit diagram which is sufficient to provide a clear network architecture of where the product might be connected, and point 3 to be revised regarding the labeling requirements for which they believe a CE marked RTTE should be approved for compliance and should not require another labeling.</p>	<p>The information required in the application forms are for the purpose of examination and for further data processing.</p> <p>Also ictQATAR's label is required as it signifies and certifies that the device is authorized & approved in Qatar and therefore could be commercialized and sold in the country.</p>
	<p>ETS believes that some of the information required on the technical construction file is impractical; for example getting test reports and certifications of compliance, instead they suggest adding flexibility to the required documentation for the technical construction file.</p>		<p>ictQATAR believes that the documents required for the Technical Construction File are comprehensive and are in line with the best practice methods used for Type Approval processing.</p>

4. List of equipment exempted from Type Approval	<ol style="list-style-type: none"> 1. Qtel believes that "cable & wiring" are not considered to be radio equipment or telecom terminal equipment, therefore suggests that these apparatus should not be excluded. 2. Qtel also submits that if there is an inbuilt wireless communication device included in a vehicle it should be type approved in the same manner as such devices not included with the vehicle. 	<ol style="list-style-type: none"> 1. Qtel suggests clarifying that cable and wiring used for telecommunications should not be considered RTTE by adding this information to the definition of RTTE as set out in section 2.1. 2. Qtel believes that there is little justification of treating such devices differently on the basis of it being installed in an automobile. 	<p>ictQATAR believes that the definition is clear and sufficient as declared. ictQATAR's purpose of highlighting that if the devices such as Car Navigational Systems are not embedded in the vehicle during the assemble line of the Manufacturer and the vehicle is purchased by a customer for personal use <u>only</u>, then they are exempted from Type Approval. However, whenever these devices are purchased after shipment by a company/dealer they are considered as standalone devices and require type approval. Also it is clear within the guidelines that exemption is only considered for the cases mentioned.</p>
	<p>IBM suggests the possibility of adding RFID Passive Tags to the list of exempted equipment. It also suggests increasing the maximum power allowed for RFID Readers.</p>	<p>IBM highlights that the RFID tags would be used in many IT equipment for inventory purposes.</p>	<p>ictQATAR considers RFID tags whether active or passive as short range devices and are therefore included within the scope of the Class license for Short Range Devices and are allowed to be used on the frequencies highlighted " 13.5333 MHz-13.567 MHz & 2446 MHz-2454 MHz" and within the specified technical limits stipulated.</p>
	<p>Denso, Visteon, Tokai Rika, Pacific Industrial, Aisin Seiki, Pioneer, & Fujitsu Ten request that "Spare Parts" for equipment that has been installed as part of a vehicle & imported to be clearly defined as "Equipment exempt from Type Approval".</p>	<p>Denso, Visteon, Tokai Rika, Pacific Industrial, Aisin Seiki, Pioneer & Fujitsu Ten believe that spare parts are the same products as the ones installed as part of a vehicle (which are exempted from Type Approval), and different from stand alone</p>	<p>ictQATAR would develop the list of exempted equipment including spare parts at a later stage. For further clarification, if the radio communication devices are already type approved then the corresponding spare parts would therefore be exempted.</p>

		<p>devices (which are not exempted from Type Approval). Denso proposes additional descriptions to differentiate between exempted and not-exempted equipment, as an example of a description of Vehicle component RTTE exempted from Type Approval:</p> <ul style="list-style-type: none"> - If equipment is installed as part of a vehicle (car, motorcycle). - Devices include car navigation, remote sensor, and remote car key. - Devices imported as "Spare Parts" are included. - Suggests adding Tire Pressure Monitoring System as an exempted equipment same as car navigation systems. 	<p>Also, ictQATAR would like to clarify that the purchase of these devices are only exempted from the type approval if they are purchased for the personal use of the Individual. However, these devices require type approval if they are purchased as standalone devices or after shipment. ictQATAR aims to mention such devices so as to give an example of the devices that the clause refers to in this exemption.</p>
	<p>Fujitsu Ten suggests adding optional devices which are branded with the car manufacturer's logo, and that would or in some cases wouldn't be assembled with the vehicle.</p>	<p>Fujitsu Ten states that some optional devices are equipped during the manufacturer assemble line and some are done after shipment.</p>	<p>ictQATAR would like to declare that whether optional radiocommunication devices are assembled with the vehicle or installed after shipment, type approval would still be required.</p>
	<p>Alcatel-lucent suggests exempting RTTE which has reference documentations & external customized versions of certifications.</p>	<p>Alcatel-lucent declares that they will provide all the information required on the technical construction file as well as the required certifications.</p>	<p>This process can be followed using the simplified type approval process.</p>

<p>5. Type Approval Bodies recognized by ictQATAR</p>	<p>Qtel submits that a testing laboratory should not be considered as a body that evaluates compliance with type approval requirements, as it can only certify whether a particular type of equipment operates within a set of technical parameters.</p>	<p>Qtel believes that it should be up to a "notified body" or national regulatory authority to determine whether the observed technical parameters are in compliance with a pre-defined standard set of essential requirements. It also states that the same body should not both undertake the evaluation and make the final legal certification, as it believes that there is a fundamental conflict of interest inherent in fulfilling both roles.</p>	<p>ictQATAR believe that alternative methods for compliance are provided. Also, these bodies have been certified and used by other Regulatory Authorities. ictQATAR would like to clarify that in addition to the testing reports, these would still need to go through the standard type approval process for final authorization and certification.</p>
	<p>TUV Rheinland Japan requests to be included in the list of Type Approval Bodies, it declares that it is authorized by the Japanese Ministry to approve radio and wired telecommunications equipment.</p>	<p>TUV Rheinland confirms that it has Radio & EMC accreditations from VLAC which is a member of the ILAC (International Laboratory Accreditation Cooperation), it also has accreditation from DATech also a member of ILAC.</p>	<p>ictQATAR will consider adding TUV to the list of recognized type approval bodies. ictQATAR would also like to declare that other bodies will be considered even if not included in the list. Also as stated in the document, the list of accredited testing laboratories would be updated regularly.</p>
	<p>Alcatel-lucent suggests that the Type Approval bodies' criteria to be based on Laboratory international standard approved specifications & not by Organization or Branch or Country.</p>	<p>Alcatel-lucent believes that Organizations or Branches could be varied each year based on Suppliers' Policies & testing Market price.</p>	<p>ictQATAR believes that the list of accredited testing laboratories is members of the International Laboratory Accreditation Cooperation (ILAC) and is not however considered by branch or country.</p>

	<p>QSAT & ETS suggest that the NRA of other GCC countries like Oman and Kuwait should be added to the list of type approval bodies.</p>	<p>QSAT & ETS believe that adding these NRAs would save a lot of time and effort for the applicant as well as ICT.</p>	<p>ictQATAR would like to declare that the Frequency Allocation Plan for some GCC Countries are not the same. Therefore, ictQATAR reserves the right to add such NRA whenever it deems possible and in accordance with Qatar's NFAP.</p>
	<ol style="list-style-type: none"> 1. Cisco suggests that ictQATAR looks into adding other regulatory bodies from the Middle East to the list of NRAs. 2. Cisco also suggests including a list of recognized CABs for the Simplified Type Approval Process. 	<ol style="list-style-type: none"> 1. Cisco suggests adding TRC Jordan, TRA Oman, & TRA Lebanon. 2. Cisco believes that ictQATAR should focus more on unifying their regulation with other Gulf countries in order to take a step further in unifying the standards and regulations in the region, by automatically certifying all products which are already type approved in any of the GCC countries (or in this case, going through the Simplified Approval Process). 	<ol style="list-style-type: none"> 1. ictQATAR would like to declare that the Frequency Allocation Plan for some GCC Countries as well as Middle Eastern Countries are not the same. Therefore, ictQATAR reserves the right to add such NRA whenever it deems possible and in accordance with Qatar's NFAP. 2. ictQATAR concurs that they are making efforts to unify regulations with neighboring GCC Countries.
<p>6. Accredited Testing Laboratories recognized by ictQATAR</p>	<p>Qtel suggests adding a list of specific domains for which laboratories are accredited, for example:</p> <p>Electrical Safety: EMC ISDN layer 1 ISDN layer 2&3 GSM Tetra</p>	<p>Qtel believes that accreditation is linked to a specific domain; therefore it suggests identifying these tests in terms of domains.</p>	<p>ictQATAR would like to declare that the list of Accredited Laboratories cover all of the domains under the standards recognized by ictQATAR.</p>

	TUV Rheinland Japan wishes to be included in the list of accredited testing laboratories.	TUV verifies that it has accreditation of ISO/IEC 17025 from DATech which is a member of ILAC.	ictQATAR would like to declare that other bodies will be considered even if not included in the list. Also as stated in the document, the list of accredited testing laboratories would be updated regularly.
	Alcatel-lucent suggests having the criteria based on specifications & compliance with international Standards and not by Organizations, and Branches.	Alcatel-lucent suggests that these Organizations & Branches could be changed any time.	ictQATAR believes that providing a certificate from one of the accredited Conformity Assessment Bodies or Accredited Testing Laboratories recognized by ictQATAR ensures that RTTE sold in Qatar are in compliance with International Standards.
	Cisco suggests ictQATAR to add "The American Association for Laboratory Accreditation (A2LA) to the list of accredited testing Laboratories.		ictQATAR would consider adding A2LA, however would like to state that since this laboratory is considered in Region 2 and some of the services allocated in that region are not in line with Region 1, therefore it wouldn't be applicable in Qatar.
	ETS believes that Accredited Testing Laboratories from the Gulf countries should also be added to the list.		ictQATAR will include some Laboratories of Gulf Countries if there are any to the List of Accredited Testing Laboratories. The list of Laboratories of Gulf Countries would be added to the List of Accredited Testing Laboratories in the near future.

<p>7. Import limit on the number of units for personal use</p>	<ol style="list-style-type: none"> 1. QSAT suggests only allowing RTTE exempted from the type approval process to be allowed to be imported by individuals or companies for personal use. 2. It also recommends that companies should not be allowed to import type approval exempt RTTE if there is an authorized importer for that brand of equipment in Qatar, however they suggest allowing a company a maximum of 4 units for testing purposes only. 3. It also recommends that individuals or companies should not be permitted to import any equipment in any quantity when there is a licensed operator providing services with these specific categories of equipment (e.g. licensed VSAT services operator). 	<p>QSAT believes that if companies are allowed to import such quantities, there may be a tendency to resell the equipment and it will be difficult for ICT to track such activities.</p>	<p>The list of type approval exempt equipment does not include VSAT equipments. This exemption only applies to the equipment highlighted. Also ictQATAR's aim to allow these companies to import for their own use, is for the purpose of eliminating unnecessary limits and burdens on these companies when importing equipment used for their individual and not for marketing purposes.</p>
	<p>Cisco suggests increasing the maximum allowed number of units within the same family.</p>	<p>Cisco believes that they would require a number of equipment if they need to provide an in-country demo lab for their customers, therefore they might exceed the limit.</p>	<p>ictQATAR believes that the maximum number allowed are sufficient, it would also like to state that it has already declared in the document that whenever companies wish to import more than the allowed limit may request so in writing to ictQATAR explaining the reasons for their request.</p>

8. Content of the published Type Approval Register	<p>Denso, Visteon, Tokai Rika, Pacific Industrial, Aisin Seiki & Pioneer request that the following items not to be included in the list of the Published Type Approval Register:</p> <ul style="list-style-type: none"> -all the information on the technical set of data not to be included, except; the operating frequency band, the radio frequency power & whether a license is required from ictQATAR. -all the information on the compliance set of data. 	<p>Denso, Visteon, Tokai Rika, Pacific Industrial, Aisin Seiki & Pioneer prefer that this information not to be included as it might include items that they would not like to be disclosed to competitors, in order to protect their confidential information from other companies in the same industry.</p>	<p>ictQATAR would advise applicants to indicate in writing that for the purpose of their rights of information disclosure, they would prefer that these information not to be made public. Also ictQATAR would like to declare that the information which would be included in the register would only include the designation to identify the product as well as the certificate number, however RF characteristics will not be published.</p>
	<p>TRW suggests that not all the information on the technical set of data applies to vehicle installed equipment and should not be included. Information such as the transmission capacity, channel spacing, frequency stability, modulation type & ITU emission designator do not apply to vehicles.</p>	<p>TRW believes that these types of information does not apply to equipment such as remote keyless systems & TPMS systems</p>	<p>The information required in the application forms are for the purpose of our examination, however some details will not apply to all devices/equipments. ictQATAR would advise applicants to provide whichever is relevant to their equipment.</p>
	<p>Cisco believes that the "Technical" and "Compliance" sections of the register might not be that relevant to the importer, therefore such information would not be needed in the Type Approval register.</p>	<p>Cisco states that the main information that would be required for importers is whether or not the equipment is type approved and if it requires a license.</p>	<p>The purpose of the register is for data collection for the purpose of ictQATAR's administrative work, in some cases not all of the information in the register would be published on our website. ictQATAR reserves the right to include or omit some of the information as it deems appropriate.</p>
9. Content of the published Importer Register	<p>QSAT suggests adding the company's website to the Importer Register. QSAT also questions whether companies would be able to provide information to be included in the notes field.</p>	<p>QSAT believes this source of information would be a welcomed service provided by ICT as it is very useful to quickly find the authorized information of required equipment.</p>	<p>ictQATAR welcomes the suggestion and would publish the website where available.</p>

Table 2: Summary of Additional Comments

Respondent	Additional Comments	ictQATAR's Comments
HBC-radiomatic GmbH	HBC-radiomatic GmbH suggests the possibility of type approving one internal RF module for different models, with the assumption that a complete radio system has the same RF features, and that the only difference is the number of hardware devices as well as the housing of these devices.	ictQATAR would like to declare that a series or family of equipments having the same characteristics would not be given one certificate, such devices would be type approved for each individual model separately.
Qtel	Qtel believes that the proposal to recognize type approvals of other national regulatory authorities in a "simplified process" is generally sound. It believes however, that the details of the "standard process" will rarely be used and will be of lesser importance.	ictQATAR understands that the standard will be rarely used. However, ictQATAR's purpose of providing two separate processes is to cover aspects where equipments are new to the market and have not been commercialized in any of the GCC Countries or Worldwide Countries.
ETS (Eastern Technology Systems)	<ol style="list-style-type: none"> 1. ETS believes that "License-Free Radio Equipment" such as handheld radios should not be allowed to be imported and such radios should not be considered as License-Free radio equipment. 2. ETS also believes that in the cases of Handheld/Mobile/Marine radios, a type approval for any particular equipment should not mean that anyone can import them. Only the Authorized Distributors for those products should be allowed to import this radio equipment. 3. ETS suggests increasing the validity of authorization for some Marine Radio equipment to two years instead of the 6 months validity period for "Type Acceptance". 4. ETS strongly suggests that ictQATAR should increase its surveillance for the un-authorized use of radios in the country. It also suggests that a full fledged RF frequency monitoring system should be placed in many areas in Qatar so that ictQATAR will immediately come to know who is using the un-authorized radios or the unauthorized frequencies. 	<ol style="list-style-type: none"> 1. ictQATAR would like to clarify that as declared in the definition of License Free Radio equipment in the document, this applies to certain equipment an example of these are Mobile Handsets, cordless phones, and Bluetooth devices. 2. However, Licensed Radio equipment require an end-user license to own/operate such devices, these devices include but are not limited to Tetra Mobile, Private Mobile Radio, Marine Radios, Handheld Radios. 3. ictQATAR would also like to state that type acceptance will no longer be valid with the new Type Approval Regime, and the validity of such devices would be an unlimited period of time provided no modifications have been made to the approved equipment. 4. ictQATAR believes that the implementation of a Frequency Management System is out of the scope of Type Approval and would be considered on a different policy.