

## **LPRA request on RED HEN not available by 13 June 2017**

### **Introduction**

The Low Power Radio Association (LPRA) represents the interests of the Short Range Devices (SRD) industry. SRD's are used in a wide range of professional and consumer applications as diverse as remote controls for home automation and car key fobs, wireless smoke alarms, RFID systems and – tags, medical telemetry and remote environmental monitoring/control systems, etc..

### **Problem statement**

During the current transition period between the R&TTE-D and the RED, there is significant concern from our LPRA members that the development of some of the ETSI standards required to demonstrate compliance with the RED is taking a much longer time than expected. Moreover, it is certain that some of these ETSI standards that support RED will not be cited in the EUOJ before the 13 June 2017 RED deadline. Until these specific standards are cited in the EUOJ, they cannot be harmonised and, as a result, cannot be applied by manufacturers to benefit from presumption of conformity to the RED without the need for a Notified Body Opinion.

### **LPRA request for clarification**

During the transition period between the R&TTE-D and the RED, the available solutions for manufacturers using standards if these standards are not harmonised before June 13, 2017 are listed below:

- Solution 1: Stockpiling (in the sense of the [blue guide](#) page 19).
- Solution 2: Continue claiming compliance to the R&TTE-D after June 13, 2017 even though the R&TTE-D is repealed on June 13, 2017. So products compliant to R&TTE-D after June 13, 2017 will not be compliant to the RED.
- Solution 3: Go through a RED Notified Body and use standards recommended by the RED Notified Body. Note the feasibility of this solution is uncertain because there are a limited number of RED Notified Bodies available to manufacturers in multiple industries.
- Solution 4: Claim compliance to the RED using available latest draft ETSI Committee RED standards or ETSI RED published standards without going through a Notified Body.

Instead of creating an unclear situation, LPRA seeks from TCAM to obtain a recognition of the standards development timeline and agreement from Market Surveillance Authorities to allow flexibility on applied Harmonised Standards and discretion on the administrative compliance on applied standards to benefit from presumption of conformity to the RED (solution 4) during a period of 12 months after the 13 June 2017 RED deadline.

