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The Manager

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On behalf of Motorola Solutions Australia and New Zealand, we would like to bring up the issue on not having the RCM Number on the Label information that is carrying the RCM Logo.

The issue is how a customer / end user knows that the product is registered on the EESS/ERAC Government Web site.

We have had lots of enquiries on Motorola Solutions products in the past since moving to this New RCM Mark as the original C-Tick had to have the number listed with the product, but now we again would like to present this again as it should be with the RCM Logo on the product as in this is to help in tracking the product back to the original registered RCM Number

With so many gray imports just having the RCM Logo on the product, how is this addressed by the ACMA?

As have in the past had gray imports with Photographs from some of your ACMA inspectors, and we have told them that these are NOT Motorola (Motorola Solutions) product but gray imports.

We support that all suppliers must register on a new national database, but we believe that the requirements to include supplier's identification on the product labelling should be reinstated to minimize the chances of the importation of gray product and the abuse of the RCM Label

From our EME person where is what he is proposing below:

Regarding the document titled "Draft Amendments to Radiocommunications Equipment (General) Rules 2021 – EME changes.docx", at the Table on p. 47 under the clause "Part 3—Measurement methods and assessment methods for EME standard", and specifically on Item no. 2 concerning the applicability of the measurement methods set out in EN 62209-2, we note that the "Manner of use" description for this standard explicitly excludes wireless devices operated "in close proximity to the human ear or human head" (emphasis added).

We would like to point out some potential confusion stemming from the apparent exclusion of the "human head", since the EN 62209-2 standards includes the method to test wireless devices operated (within 20 cm) in front of the face, therefore in close proximity to the head, but not in close proximity to the ears. The scope of EN 62209-2 holds "This part of IEC 62209 series is applicable to any wireless communication device (...) when held (...) in front of the face (...)."



The reason for the potential confusion is that the subsequent Item no. 3 in the same table, addressing “Measurement methods set out in IEC/IEEE 62209-1528”, i.e. the “unified standard” replacing IEC 62209-1 and IEC 62209-2, is characterized as “including in close proximity to the human ear or human head”. Because IEC/EN 62209-1 only deals with devices operated close to the ears, one may conclude that in this context the reference to “human head” includes the case of devices operated in front of the face, and consequently that the explicit exclusion of the “human head” in Item no. 2 implies that the standard EN 62209-2 in Item no. 2 cannot be applied to devices operated in front of the face, while IEC/IEEE 62209-1528 can, even though these two standards define the same test method for wireless devices operated in front of the face.

We respectfully suggest clarifying this aspect in a footnote to Item no. 2, stating explicitly that EN 62202-2 methods are applicable to devices operated in front of the face, or, alternatively, delete “or human head” in the same Item, under “Manner of use”.

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