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To whom it may concern,
We would like to thank you and your offices for the ongoing commitment to achieve regulatory alignment, as well as consistency and flexibility for manufacturers, an essential undertaking, which offers continued benefits to all parties.

We are writing to you today to submit our comments on the current public consultation, opened June 2022, regarding the proposal to include QR codes in the Telecommunications Labelling Notice and repeal 3 telecommunications standards.

Bosch supports the proposal to add the QR code as a possible label alternative and provides the following comments on Question 1 from the consultation as listed below:

Question 1

The ACMA proposes to amend the Telecommunications Labelling Notice to specify that a label must be in the form of the Regulatory Compliance Mark (RCM) or a QR code, or similar thing, if the relevant hyperlink is to information on a website that displays the RCM prominently.

This proposed amendment is consistent with the requirements in Schedule 3, Part 2, subclause 5(1) of the General Equipment Rules.

Do you have any comments on this proposed amendment?

Proposed Amendment:

02 August 2022

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***Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling)
Instrument 2015 (F2015L00190)***

Section 10 Form of a compliance label

(1) A compliance label must be:

(a) In the form of the RCM; or

(b) A QR code, or similar thing, if the relevant link is to information on a website that displays the RCM prominently.

We have reviewed the proposed amendment to Section 10 and would like to make the following comments:

1. We agree with ACMA that allowing the possibility of using a QR code instead of the RCM label is most beneficial to manufacturers
 - a. As the customs offices in several countries already have QR code scanning devices and allow the use of QR codes to replace labels, this ACMA initiative provides an opportunity to remove sizable labels from the device and replace them with QR codes.
 - b. For devices designed to be installed in another host equipment or structure (e.g. a vehicle), it is more effective for the relevant authority and end users to scan a QR code rather than trying to read labels that may not be easily accessible.
 - c. Faster updates to labels are possible when it can be done electronically and the device itself does not require a new housing due to a label change.
2. We propose that only one QR code is placed on the product and via this link the relevant authority and the end user have the possibility to view all necessary type approval markings for the device, not only the RCM mark.
 - a. This means that the link behind the QR code would lead to the RCM mark. However, other type approval markings applicable to that device may also be displayed through the same QR code, as long as the RCM mark remains visible, legible and understandable.
 - b. This is also beneficial to manufacturers (e.g. vehicle manufacturers) as space on the product and in the corresponding manual can be saved by replacing all current country specific labelling with one single QR code.

- c. In cases where the label is allowed on the packaging or leaflet accompanying the device, the QR code should also be a possible alternative.

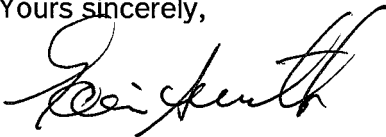
In addition, we would like to take this opportunity to submit the following comments for your consideration:

1. For manufacturers of radio equipment (e.g. vehicle radar sensors) the relevant labelling regulation is the Radiocommunications (Compliance Labelling – Devices) Notice 2014 (F2017C01074).
 - a. We would welcome an update to this regulation allowing the use of QR codes, in particular considering our implementation proposals above.

We trust that you understand the impact for our industry and appreciate a subsequent consideration of our proposal. For further technical information, please contact:

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Yours sincerely,



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