

De: [REDACTED] - Grace SMITH (Ms.) [REDACTED]

Enviado: miércoles, 27 de septiembre de 2023 06:03 a. m.

Para: Informacion UPR

Asunto: Consulta Pública sobre el "Anteproyecto de Lineamientos para el uso del Sello IFT del Instituto Federal de Telecomunicaciones en productos, equipos, dispositivos o aparatos destinados a telecomunicaciones o radiodifusión homologados"

Ref: "Anteproyecto de Lineamientos para el uso del Sello IFT del Instituto Federal de Telecomunicaciones en productos, equipos, dispositivos o aparatos destinados a telecomunicaciones o radiodifusión homologados"

Dear IFT Officer,

We would like to submit our comments, opinions and contributions on behalf of car manufacturer, who convey their strong interest in strictly complying with IFT regulations and wish to make marking and labelling easy to implement during manufacturing.


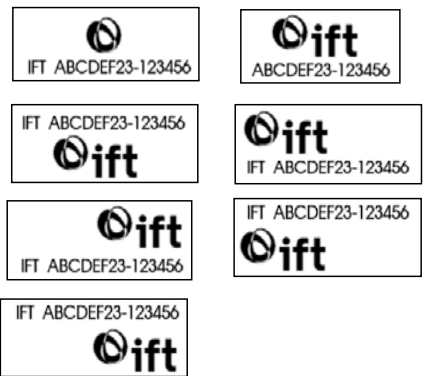
Attached, please find our comments (as a pdf document and excel documents).

Please confirm good reception of our comments and opinions.
Thank you.

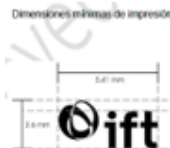
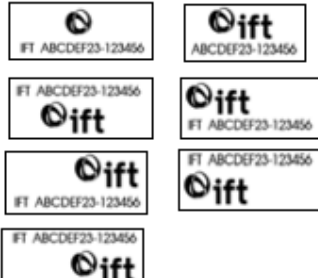
With best regards,

Grace Smith (Ms.)
Sales / Key Accounts



Artículo o apartado	Comentario, opiniones o aportaciones	Original	English	Comments
Quinto	<p>With the development of technology and the expansion of its application, the size of radio equipment has been getting smaller, and it results in a limited area on the products available for marking or labelling.</p> <p>Also, radio equipment is now subject to Type Approval in most countries, and there are many other conformity markings to be indicated on the approved products.</p> <p>In order to indicate all the necessary regulatory information on the products within a limited area, we'd like to propose following amendments:</p> <p>1) Deletion of requirements related to the protection area. We believe that this will create an area for other markings.</p>	<p>Quinto. – El Titular del Certificado de Homologación, filiales, subsidiarias e importadores deberán hacer uso del Sello IFT respetando en todo momento las especificaciones establecidas a continuación:</p> <p>El Sello IFT deberá estar impreso en color negro 100% positivo o negro 100% negativo, respetar las áreas de protección y dimensiones mínimas de impresión como se define en la Figura 1.</p>  <p>Las áreas de protección son los espacios perimetrales alrededor del Sello IFT, en las cuales no deben colocarse textos u otros elementos gráficos a fin de permitir la legibilidad, como referencia utilizar la red de trazo de la figura 2.</p>	<p>Fifth. – The Holder of the Homologation Certificate, affiliates, subsidiaries and importers must use the IFT Seal, respecting at all times the specifications established below:</p> <p>The IFT Seal must be printed in 100% positive black or 100% negative black, respecting the protection areas and minimum printing dimensions as defined in Figure 1.</p> <p>The protection areas are the perimeter spaces around the IFT Seal, in which texts or other graphic elements should not be placed in order to allow legibility, as a reference use the line network in figure 2.</p>	<p>We'd like to delete the requirement about the space so that we can have more area for markings required by other countries.</p>
Sexto (First paragraph)	<p>2) Deletion of requirements of minimum dimensions</p> <p>Since Sexto of these Guidelines mention that the marking must be legible without the help of magnification and easily visible, and we believe that following this requirement will result in the appropriate marking size large enough to be legible without the aid of magnification, and we'd like to propose the deletion of the image of "Dimensiones mínimas de impresión" from Figure 1 in Quinto and deletion of following part from Sexto:</p> <p><i>considerando las dimensiones mínimas de impresión mostradas en la Figura 1.</i></p>	<p>Sexto. – El Sello IFT es un elemento adicional en el marcado o etiquetado de los Productos homologados a que se refiere el lineamiento Trigésimo octavo de los "Lineamientos de Homologación", por lo que deberá ser legible sin la ayuda de aumento o magnificación, y fácilmente visible por el usuario final, considerando las dimensiones mínimas de impresión mostradas en la Figura 1.</p>	<p>Sixth. – The IFT Seal is an additional element in the marking or labeling of the approved Products referred to in the Thirty-eighth guideline of the "Homologation Guidelines", so it must be legible without the help of magnification or magnification, and easily visible by the end user, considering the minimum printing dimensions shown in Figure 1.</p>	<p>We believe that any specific/detailed size requirement is not necessary as long as the marking is large enough to be legible without the aid of magnification.</p> <p>For example, FCC nor ANATEL specifies such specific/detailed size requirement for its logo.</p>
Sexto (Second paragraph)	<p>In order to allow the Holder of the Certificate of Homologation to effectively use the limited area on the products, we'd like to propose to add following options of marking layout to Figure 3:</p> 	<p>El marcado o etiquetado del Producto debe estar constituido por el Sello IFT, el prefijo IFT en mayúsculas y el Número de Certificación, tal como se muestra en la figura 3.</p>	<p>The marking or labeling of the Product must consist of the IFT Seal, the IFT prefix in capital letters and the Certification Number, as shown in figure 3.</p>	<p>The more layout options we have, the more area on products we can use for other markings.</p>
	<p>Also, in order to let the Holder of Certificate of Homologation have further options, we'd like to propose an addition of following sentence:</p> <p><i>In case where the size or nature of the radio equipment does not allow to indicate marking as shown in Figure 3, indication of "el prefijo IFT en mayúsculas y el Número de Certificación" would be acceptable.</i></p>			<p>We'd like to have an option to indicate just "IFT" and "approval number". (Not "Sello IFT")</p>

Octavo	<p>Considering the purpose of these Guidelines, we believe that the most important thing is that end-users can recognize that the radio equipment they are going to use is approved by IFT.</p> <p>However, as for radio equipment to be installed in a vehicle, it is not possible for end-users to see the markings in normal use, and we'd like to propose an amendment of the sentence as below:</p> <p><i>Eighth. – Exceptionally, in case where the size or nature of the radio equipment does not allow to indicate the marking or labeling physically in accordance with the provisions of the Fifth and Sixth of these Guidelines, it can be on the packaging or in the user manual.</i></p>	<p>Octavo. – Excepcionalmente, en caso de que el Producto sea tan pequeño que no sea posible exhibir el marcado o etiquetado físicamente acorde a lo establecido en los lineamientos Quinto y Sexto, de los presentes lineamientos, se atenderá lo establecido en el numeral 1 de la fracción II del lineamiento Trigésimo Octavo de los "Lineamientos de Homologación".</p>	<p>Eighth. – Exceptionally, in the event that the Product is so small that it is not possible to display the marking or labeling physically in accordance with the provisions of the Fifth and Sixth guidelines of these guidelines, the provisions established in numeral 1 of section II will be followed. of the Thirty-eighth guideline of the "Homologation Guidelines".</p>	<p>Instead of referring to the conditions specified in another Guideline, we'd like the option of marking location to be clearly mentioned.</p>
Segundo of Transitorios	<p>This paragraph will be very helpful to reduce the burden on the Holder of the Certificate of Homologation, and we believe that addition of following sentence will allow the Holder of the certificate of Homologation to have more flexible options in order to follow these Guidelines.</p> <p><i>However, it is also allowed to follow these Guidelines for those products that have been approved prior to the entry into force of these Guidelines.</i></p>	<p>Segundo. - Aquellos Productos que hayan sido homologados previo a la entrada en vigor de los presentes Lineamientos, y se encuentren amparados por el Certificado de Homologación vigente respectivo, y los que hayan iniciado el trámite para obtener su Certificado de Homologación y dicho trámite no haya concluido a la entrada en vigor, no estarán sujetos al cumplimiento de los presentes.</p>	<p>Second. - Those Products that have been approved prior to the entry into force of these Guidelines, and are covered by the respective current Certificate of Approval, and those that have started the process to obtain their Certificate of Approval and said process has not been completed by upon entry into force, will not be subject to compliance with these provisions.</p>	<p>We'd like to have following options for products approved before the implementation of the new guidelines:</p> <ol style="list-style-type: none"> 1) To keep the current indication (No change), or 2) To change the indication in accordance with the new guidelines

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2	Artículo o anexo	Comentario, omisiones o aclaraciones	Original	English	Comments
3	Quinto	<p>With the development of technology and the expansion of its application, the size of radio equipment has been getting smaller, and it results in a limited area on the products available for marking or labelling.</p> <p>Also, radio equipment is now subject to Type Approval in most countries, and there are many other conformity markings to be indicated on the approved products.</p> <p>In order to indicate all the necessary regulatory information on the products within a limited area, we'd like to propose following amendments:</p> <p>1) Deletion of requirements related to the protection area. We believe that this will create an area for other markings.</p>	<p>Quinto. - El Titular del Certificado de Homologación, filiales, subsidiarias e importadores deberán hacer uso del Sello IFT respetando en todo momento las especificaciones establecidas a continuación:</p> <p>El Sello IFT deberá estar impreso en color negro 100% positivo o negro 100% negativo, respetar las áreas de protección y dimensiones mínimas de impresión como se define en la Figura 1.</p>  <p>Las áreas de protección son los espacios perimetrales alrededor del Sello IFT, en las cuales no deben colocarse textos u otros elementos gráficos a fin de permitir la legibilidad, como referencia utilizar la red de trazo de la figura 2.</p>	<p>Fifth. - The Holder of the Homologation Certificate, affiliates, subsidiaries and importers must use the IFT Seal, respecting at all times the specifications established below:</p> <p>The IFT Seal must be printed in 100% positive black or 100% negative black, respecting the protection areas and minimum printing dimensions as defined in Figure 1.</p> <p>The protection areas are the perimeter spaces around the IFT Seal, in which texts or other graphic elements should not be placed in order to allow legibility, as a reference use the line network in figure 2.</p>	<p>We'd like to delete the requirement about the space so that we can have more area for markings required by other countries.</p>
4	Seeto (First paragraph)	<p>2) Deletion of requirements of minimum dimensions</p> <p>Since Seeto of these Guidelines mention that the marking must be legible without the help of magnification and easily visible, and we believe that following this requirement will result in the appropriate marking size large enough to be legible without the aid of magnification, and we'd like to propose the deletion of the image of "Dimensiones mínimas de impresión" from Figure 1 in Quinto and deletion of following part from Seeto:</p> <p><i>considerando las dimensiones mínimas de impresión mostradas en la Figura 1.</i></p>	<p>Seeto. - El Sello IFT es un elemento adicional en el marcado o etiquetado de los Productos homologados a que se refiere el lineamiento Trigésimo octavo de los "Lineamientos de Homologación", por lo que deberá ser legible sin la ayuda de aumento o magnificación, y fácilmente visible por el usuario final, considerando las dimensiones mínimas de impresión mostradas en la Figura 1.</p>	<p>Sixth. - The IFT Seal is an additional element in the marking or labeling of the approved Products referred to in the Thirty-eighth guideline of the "Homologation Guidelines", so it must be legible without the help of magnification or magnification, and easily visible by the end user, considering the minimum printing dimensions shown in Figure 1.</p>	<p>We believe that any specific/detailed size requirement is not necessary as long as the marking is large enough to be legible without the aid of magnification.</p> <p>For example, FCC nor ANATEL specifies such specific/detailed size requirement for its logo.</p>
5	Seeto (Second paragraph)	<p>In order to allow the Holder of the Certificate of Homologation to effectively use the limited area on the products, we'd like to propose to add following options of marking layout to Figure 3:</p> 	<p>El marcado o etiquetado del Producto debe estar constituido por el Sello IFT, el prefijo IFT en mayúsculas y el Número de Certificación, tal como se muestra en la figura 3.</p>	<p>The marking or labeling of the Product must consist of the IFT Seal, the IFT prefix in capital letters and the Certification Number, as shown in figure 3.</p>	<p>The more options we have, the more area on products we can use for other markings.</p>
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7	Octavo	<p>Considering the purpose of these Guidelines, we believe that the most important thing is that end-users can recognize that the radio equipment they are going to use is approved by IFT.</p> <p>However, as for radio equipment to be installed in a vehicle, it is not possible for end-users to see the markings in normal use, and we'd like to propose an amendment of the sentence as below:</p> <p><i>Eightth. - Exceptionally, in case where the size or nature of the radio equipment does not allow to indicate the marking or labeling physically in accordance with the provisions of the Fifth and Sixth of these Guidelines, it can be on the packaging or in the user manual.</i></p>	<p>Octavo. - Excepcionalmente, en caso de que el Producto sea tan pequeño que no sea posible exhibir el marcado o etiquetado físicamente acorde a lo establecido en los lineamientos Quinto y Seeto, de los presentes lineamientos, se atenderá lo establecido en el numeral 1 de la fracción II del lineamiento Trigésimo Octavo de los "Lineamientos de Homologación".</p>	<p>Eightth. - Exceptionally, in the event that the Product is so small that it is not possible to display the marking or labeling physically in accordance with the provisions of the Fifth and Sixth guidelines of these guidelines, the provisions established in numeral 1 of section II will be followed, of the Thirty-eighth guideline of the "Homologation Guidelines".</p>	<p>Instead of referring to the conditions specified in another Guideline, we'd like the option of marking location to be clearly mentioned.</p>
8	Segundo de Transitorios	<p>This paragraph will be very helpful to reduce the burden on the Holder of the Certificate of Homologation, and we believe that addition of following sentence will allow the Holder of the certificate of Homologation to have more flexible options in order to follow these Guidelines.</p> <p><i>However, it is also allowed to follow these Guidelines for those products that have been approved prior to the entry into force of these Guidelines.</i></p>	<p>Segundo. - Aquellos Productos que hayan sido homologados previo a la entrada en vigor de los presentes lineamientos, y se encuentren amparados por el Certificado de Homologación vigente respectivo, y los que hayan iniciado el trámite para obtener su Certificado de Homologación y dicho trámite no haya concluido a la entrada en vigor, no estarán sujetos al cumplimiento de los presentes.</p>	<p>Second. - Those Products that have been approved prior to the entry into force of these Guidelines, and are covered by the respective current Certificate of Approval, and those that have started the process to obtain their Certificate of Approval and said process has not been completed by upon entry into force, will not be subject to compliance with these provisions.</p>	<p>We'd like to have following options for products approved before the implementation of the new guidelines:</p> <p>1) To keep the current indication (No change), or</p> <p>2) To change the indication in accordance with the new guidelines</p>
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