- Grace SMITH (Ms.)

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 |
|---------------------|--|--|--|---|
| | 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. 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. In order to indicate all the necessary regulatory information on the products within a limited area, we'd like to propose following amendments: 1) Deletion of requirements related to the protection area. We believe that this will create an area for other markings. | 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: 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. Dimensiones mínimas de impresión 5.41 mm 1.5.41 mm 2.6 mm 1.5.41 mm 2.6 mm 2.6 mm 2.6 mm 2.7 mm 3.7 mm 4.7 mm 4 | Fifth. – The Holder of the Homologation Certificate, affiliates, subsidiaries and importers must use the IFT Seal, respecting at all times the specifications established below: 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. 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. | We'd like to delete the requirement about the space so that we can have more area for markings required by other countries. |
| | 2) Deletion of requirements of minimum dimensions 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 minimas de impresion" from Figure 1 in Qinto and deletion of following part from Sexto: considerando las dimensiones mínimas de impresión mostradas en la Figura 1. | 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. | 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. | |
| | 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: | 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. | 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. | We'd like to have an option to indicate just "IFT" and |
| | options, we'd like to propose an addition of following sentence: 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. | | | "approval number". (Not "Sello IFT") |

| Octavo | Considering the purpose of these Guidelines, we believe that the most | Octavo . – Excepcionalmente, en caso de que el Producto sea tan | Eighth. – Exceptionally, in the event that the Product is so small | Instead of referring to the conditions specified in another |
|-----------------|--|--|---|---|
| | important thing is that end-users can recognize that the radio equipment they | pequeño que no sea posible exhibir el marcado o etiquetado | that it is not possible to display the marking or labeling physically | Guideline, we'd like the option of marking location to be |
| | are going to use is approved by IFT. | físicamente acorde a lo establecido en los lineamientos Quinto y | in accordance with the provisions of the Fifth and Sixth guidelines | clearly mentioned. |
| | However, as for radio equipment to be installed in a vehicle, it is not possible for | Sexto, de los presentes lineamientos, se atenderá lo establecido en el | of these guidelines, the provisions established in numeral 1 of | |
| | end-users to see the markings in normal use, and we'd like to propose an | numeral 1 de la fracción II del lineamiento Trigésimo Octavo de los | section II will be followed. of the Thirty-eighth guideline of the | |
| | amendment of the sentence as below: | "Lineamientos de Homologación". | "Homologation Guidelines". | |
| | 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. | | | |
| Segundo | This paragraph will be very helpful to reduce the burden on the Holder of the | Segundo Aquellos Productos que hayan sido homologados previo a | Second Those Products that have been approved prior to the | We'd like to have following options for products |
| of Transitorios | Certificate of Homologation, and we believe that addition of following sentence | la entrada en vigor de los presentes Lineamientos, y se encuentren | entry into force of these Guidelines, and are covered by the | approved before the implementation of the new |
| | will allow the Holder of the certificate of Homologation to have more flexible | amparados por el Certificado de Homologación vigente respectivo, y | respective current Certificate of Approval, and those that have | guidelines: |
| | options in order to follow these Guidelines. | los que hayan iniciado el trámite para obtener su Certificado de | started the process to obtain their Certificate of Approval and | 1) To keep the current indication (No change), or |
| | | Homologación y dicho trámite no haya concluido a la entrada en vigor, | said process has not been completed by upon entry into force, | 2) To change the indication in accordance with the new |
| | However, it is also allowed to follow these Guidelines for those products that | no estarán sujetos al cumplimiento de los presentes. | will not be subject to compliance with these provisions. | guidelines |
| 1 | have been approved prior to the entry into force of these Guidelines. | | | |

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| Artículo o apartado | Comentario, opiniones o aportaciones | Original | English | Comments | |
| Quinto | With the development of technology and the expansion of its | Quinto El Titular del Certificado de Homologación, | | We'd like to delete the requirement about the | |
| | | filiales, subsidiarias e importadores deberán hacer uso del | affiliates, subsidiaries and importers must use the IFT | | |
| | and it results in a limited area on the products available for | Sello IFT respetando en todo momento las | | markings required by other countries. | |
| | marking or labelling. | especificaciones establecidas a continuación: | established below: | | |
| | Also, radio equipment is now subject to Type Approval in most | El Sello IFT deberá estar impreso en color negro 100% | The IFT Seal must be printed in 100% positive black | i i | |
| | countries, and there are many other conformity markings to be | positivo o negro 100% negativo, respetar las áreas de | or 100% negative black, respecting the protection | i i | |
| | indicated on the approved products. | protección y dimensiones mínimas de impresión | areas and minimum printing dimensions as | I i | |
| | In order to indicate all the necessary regulatory information on the | como se define en la Figura 1. | defined in Figure 1. | I I | |
| | products within a limited area, we'd like to propose following | | i I | I I | |
| | amendments: | Dimensiones mínimas de impresión | i I | I I | |
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| | Deletion of requirements related to the protection area. | | | 1 | |
| | We believe that this will create an area for other markings. | | I | ! | |
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| | | 14m (C) 44+ | I | ! | |
| | | 9 11 0 | I | ! | |
| | | Las áreas de protección son los espacios | | | |
| | | perimetrales alrededor del Sello IFT, en las cuales | | | |
| | | no deben colocarse textos u otros elementos | The protection areas are the perimeter spaces | | |
| | | gráficos a fin de permitir la legibilidad, como | around the IFT Seal, in which texts or other | i | |
| | | referencia utilizar la red de trazo de la figura 2. | graphic elements should not be placed in order | | |
| | | | to allow legibility, as a reference use the line | i | |
| | | ! | network in figure 2. | | |
| | | I I | | i . | |
| | | | | | |
| (Setto | Deletion of requirements of minimum dimensions Since Seato of those Guidelines meeting that the making must be | | Sixth The IFT Seal is an additional element in the | We believe that any specific/detailed size | |
| (First paragraph) | Since Sexto of these Guidelines mention that the making must be legible without the help of magnification and easily visible, and | | marking or labeling of the approved Products referred to in the Thirty-eighth guideline of the | requirement is not necessary as long as the | |
| | we believe that following this requirement will result in the | | to in the Inity-eighth guideline of the l"Homologation Guidelines", so it must be legible | marking is large enough to be legible without the aid of magnification. | |
| | appropriate marking size large enough to be legible without the | "Lineamientos de Homologación", por lo que debera ser legible sin la ayuda de aumento o magnificación, y | without the help of magnification or magnification, | one are or magninession. | |
| | aid of magnification, and we'd like to propose the deletion of the | | and easily visible by the end user, considering the | For example, FCC nor ANATEL specifies such | |
| | image of "Dimensiones minimas de impresion" from Figure 1 in | | minimum printing dimensions shown in Figure 1. | specific/detailed size requirement for its logo. | |
| | Qinto and deletion of following part from Secto: | Figure 1. | l l | The state of the s | |
| | considerando las dimensiones mínimas de impresión mostradas | 1 | I | ! | |
| | en la Figura 1. | I | I | ! | |
| Seto | | El marcado o etiquetado del Producto debe estar | The marking or labeling of the Product must consist | The more layout options we have, the more | |
| (Second | effectively use the limited area on the products, we'd like to | constituido por el Sello IFT, el prefijo IFT en mayúsculas y | | area on products we can use for other | |
| paragraph) | propose to add following options of marking layout to Figure 3: | el Número de Certificación, tal como se muestra en la | Certification Number, as shown in figure 3. | markings. | |
| | | figura 3. | | | |
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| Octavo | FT ABCDEF23-123456 FT ABCDEF23-123456 Oifft Also, in order to let the Holder of Certificate of Homologation have further options, wild like to propose an addition of following sentance: 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 prefigio FT en markinglas y el Nimero de Certificación" would be acceptable. Considering the purpose of these Guidelines, we believe that the | | | "FT" and "approval number". (Not "Sello FT") | |
| Octavo | FT ABCDEF23-123456 FT ABCDEF23-123456 Oifft Also, in order to let the Holder of Certificate of Homologation have further options, wild like to propose an addition of following sentance: 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 prefigio FT en markinglas y el Nimero de Certificación" would be acceptable. Considering the purpose of these Guidelines, we believe that the | Issa tan pequeño que no sea posible exhibir el marcado o | | "FF" and "approval number". (Not "Sallo FT") | |
| Остано | FT ABCDEF23-123456 FT ABCDEF23-123456 Oifft Also, in order to let the Holder of Certificate of Homologation have further options, wild like to propose an addition of following sentance: It case where the size or nature of the ratio equipment does not allow to indicate making as shown in Figure 3, indication of "el portific PF or mayaisculas y of Numero de Certificación" would be acceptable. Considering the purpose of these Guidelines, we believe that the most important thing is that end-uses can recognize that the ratio quipment they are going to use is approved by FT. | Isea tan pequeño que no sea posible exhibir el marcado o letiquetado fisicamente acorde a lo establecido en los | is so small that it is not possible to display the | "FF" and "approval number". (Not "Sello FT") | |
| Осамо | FT ABCDEF23-123456 FT ABCDEF23-123456 Oifft Also, in order to let the Holder of Certificate of Homologation have further options, wild like to propose an addition of following sentance: It case where the size or nature of the ratio equipment does not allow to indicate making as shown in Figure 3, indication of "el portific PF or mayaisculas y of Numero de Certificación" would be acceptable. Considering the purpose of these Guidelines, we believe that the most important thing is that end-uses can recognize that the ratio quipment they are going to use is approved by FT. | Isea tan pequeño que no sea posible exhibir el marcado o letiquetado fisicamente acorde a lo establecido en los Ilineamientos Quinto y Sexto, de los presentes | is so small that it is not possible to display the imarking or labeling physically in accordance with the | "FF" and "approval number". (Not "Sallo FF") | |
| Octavo | FT ABCDEF23-123456 FT ABCDEF23-123456 Oifft Also, in order to let the Holder of Certificate of Homologation have further options, wild like to propose an addition of following sentence: In case where the size or nature of the radio equipment does not allow to indicate marking as shown in Figure 3, indication of "all poetigs BT en mayisculas y el Nimero de Certificación" would be acceptable. Considering the purpose of these Guidelines, we believe that the natio equipment they are going to use its approved by ET. 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 will like to propose an amendment of the sentence as below: | Issa tan pequeño que no sea posible exhibir el marcado o letiquetado fisicamente acorde a lo establecido en los Ilineamientos Quinto y Seeto, de los presentes Ilineamientos, se asenderá lo establecido en el numeral 1 Ide la facción II del lineamiento Trigésimo Octavo de los | jis so small that it is not possible to display the imaking or labeling physically in accordance with the provisions of the Fifth and Sixth guidelines of these iquidelines, the provisions established in numeral 1 of section II will be followed, of the Thirty-eighth | "FF" and "approval number". (Not "Sallo FF") | |
| Остано | FT ABCDEF23-123456 FT ABCDEF23-123456 Oifft Also, in order to let the Holder of Certificate of Homologation have further options, wild like to propose an addition of following sentence: In case where the size or nature of the radio equipment does not allow to indicate marking as shown in Figure 3, indication of "all predigio BF en mayisculas y el Número de Certificación" would be acceptable. Considering the purpose of these Guidelines, we believe that the natio equipment they are going to use in approved by FT. 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: | Issa tan pequeño que no sea posible exhibir el marcado o letiquetado fisicamente acorde a lo establecido en los Ilineamientos Quinto y Seeto, de los presentes Ilineamientos, se asenderá lo establecido en el numeral 1 Ide la facción II del lineamiento Trigésimo Octavo de los | 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 quidelines, the provisions established in numeral 1 of | "FF" and "approval number". (Not "Sallo FF") | |
| Octavo | FT ABCDEF23-123456 FT ABCDEF23-123456 Oifft Also, in order to let the Holder of Certificate of Homologation have further options, will alike to propose an addition of following sentence: In case where the size or nature of the radio equipment does not allow to indicate marking as shown in Figure 3, indication of "all oredigio BF en mayiscular y el Nimero de Certificación" would be acceptable. 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 BFT. 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: Eighth Exceptionally, in case where the since or nature of the radio equipment does not allow to indicate the marking or | Issa tan pequeño que no sea posible exhibir el marcado o letiquetado fisicamente acorde a lo establecido en los Ilineamientos Quinto y Seeto, de los presentes Ilineamientos, se asenderá lo establecido en el numeral 1 Ide la facción II del lineamiento Trigésimo Octavo de los | jis so small that it is not possible to display the imaking or labeling physically in accordance with the provisions of the Fifth and Sixth guidelines of these iquidelines, the provisions established in numeral 1 of section II will be followed, of the Thirty-eighth | "FF" and "approval number". (Not "Sallo FF") | |
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| Остано | FT ABCDEF23-123456 FT ABCDEF23-123456 Oifft Also, in order to let the Holder of Certificate of Homologation have further options, will alike to propose an addition of following sentence: In case where the size or nature of the radio equipment does not allow to indicate marking as shown in Figure 3, indication of "all oredigio BF en mayiscular y el Nimero de Certificación" would be acceptable. 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 BFT. 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: Eighth Exceptionally, in case where the since or nature of the radio equipment does not allow to indicate the marking or | Isaa tan pequeño que no sea posible exhibir el marcado o letiquestado fisicamente acorde a lo establecido en los llineamientos Quinto y Seoto, de los presentos llineamientos, se atenderá lo establecido en el numeral 1 ide la facción II del lineamiento Tripásimo Octavo de los l"tineamientos de Homologación". | jis so small that it is not possible to display the imaking or labeling physically in accordance with the provisions of the Fifth and Sixth guidelines of these iquidelines, the provisions established in numeral 1 of section II will be followed, of the Thirty-eighth | "FF" and "approval number". (Not "Sallo FF") | |
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