

Sophia Antipolis, 12 April 2017

To

The European Commission:

Mr. Andrus ANSIP, Vice-President, Digital Single Market

Ms. Elzbieta BIENKOWSKA, Commissioner, Internal Market, Industry, Entrepreneurship and SMEs

The European Council:

Mr. Jeppe TRANHOLM-MIKKELSEN, Secretary General of the Council

The European Parliament:

Mr. Jerzy BUZEK, Chairman of the ITRE Committee

Ms. Vicky FORD, Chairman of the IMCO Committee

Our ref.: DG-17-017/LJR/jjl

Dear Madam,
Dear Sir,

The Radio Equipment Directive (RED) sets a challenging time schedule for its implementation. As you know, the Directive was adopted in April 2014 and applied from June 2016 with a transition period for manufacturers which ends on 13 June 2017.

In order to support that, industry and stakeholders in the standards-making process as well as Member States need to develop Harmonised Standards that will allow manufacturers to place their products on the market with a presumption of conformity and without commercial disruption. This process also requires that the Harmonized Standards are eventually published in the Official Journal of the European Union (OJEU). I draw your attention to the fact that the European Commission has been since the very beginning associated to the discussions, both in technical committees and in governing bodies.

Despite the very demanding calendar set by the Directive – and the standardization requests that were published 16 months later, ETSI members have determinedly engaged since 2014 in the development of the Harmonized Standards in support of the RED. However, despite the regular contacts between my staff and representatives of the European Commission to seek technical solutions that will be legally acceptable, the publication of the Harmonized Standards in the OJEU is behind schedule, putting an increasing pressure on industry and the whole standards making and using system.

The situation is critical for all industries seeking to place RED compliant products on the market after 13 June 2017, in particular for SMEs whose future is often depending on one specific product line.

This situation has triggered an extensive discussion in the ETSI General Assembly meetings. ETSI General Assembly¹ #69 expressed its deep concerns with the situation and requested to take additional steps to identify solutions as the non-availability of Harmonized Standards cited in the OJEU makes it harder for companies to introduce their products in the market – and may have very regrettable effects

¹ The General Assembly is the highest decision making body in ETSI, gathering the views of its 847 members (manufacturers, operators, administrations, national standard organizations, academia and research bodies, all Annex III organisations) and its Counsellors EC and EFTA

on entire sectors of the economy in member states and ultimately, on the single market and on the European competitiveness altogether.

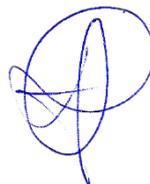
In view of this, I believe that it is our collective responsibility to find solutions that will be both technically viable and legally acceptable. Therefore in the name of ETSI members and as a result of the discussions in ETSI General Assembly #69, I respectfully encourage the European Commission, the Member States and the Parliament to agree on an extension of the time span by 1 to 2 years of either the transition period or the effective transposition of the new Radio Equipment Directive. Further delays or an incapacity to come up with acceptable solutions would be detrimental to all stakeholders in the system, the internal market and the European economy at large.

Similar proposals are being made by some Member States with strong support by industry players. Such an extension will remove the current risks and will provide a basis for returning to a solid period of standardisation development and listing of Harmonised Standards in the OJEU.

Any other solution to the issue would be equally acceptable if it provides a viable solution for market access using Harmonised Standards.

In view of the above, I would like to request a meeting with you at your earliest convenience and in the shortest possible timeframe to try and further explore all the options.

Sincerely yours,



Luis Jorge Romero
Director General

Cc:

Ms. Lowri EVANS, Director General, DG GROW

Mr. Roberto VIOLA, Director General, DG CNECT

Mr. Klaus BAIER, Secretary of the ITRE Committee

Mr. Panos KONSTANTOPOULOS, Secretary of the IMCO Committee

ETSI GA Chairman: Mr. Simon Hicks

ETSI Board Chairman: Mr. Dirk Weiler

Members of ETSI