



Cisco Systems, Inc. is pleased to provide its brief comments on the consultation published by the TRC:

<b>TRC draft regulation</b>	<b>Cisco comments</b>
The validity of the certificate will be one year instead of three years	Cisco disagree the idea of limiting the certificate's validity period to just one year, especially considering that there haven't been any technical modifications to the products. We are still using the same test reports, which indicates that the products have maintained their quality and performance over time. Given that the product life cycle for Cisco products is a minimum of five years, we suggest a validity period of three years. This would adequately cover the product life cycle while assuring that the test reports are still relevant and valid.
The lead time will be 20 days instead of 10 days	We believe extending the lead time from 10 to 20 days might not be the most efficient approach as this will delay the shipments to be cleared from Customs.
Exemptions: The list of exemptions has been modified as follows: •Printers, copiers, and monitors that do not include any high-power radio functions.	We acknowledge and appreciate TRC's commitment to uphold stringent standards of safety and reliability. However, we would like to respectfully raise a concern regarding the necessity of type approval certifications for these particular items. Given that they are low-risk, non-consumer, non-wireless products that utilize well-established technology, we believe the need for such certification might be reconsidered.



<ul style="list-style-type: none"><li>•Short-range remote controls products using infrared.</li><li>•Electronic parts that do not include any radio functions.</li><li>•Short Range Devices that support Bluetooth technology only.</li><li>•Satellite television receivers</li><li>•Laptops and desktop computers</li><li>•Wireless Mouses &amp; keyboards.</li></ul> <p>The following have been removed from the exemption: switches, servers, firewall, chassis, cables from exemption and now TRC is required for these parts.</p>	<p>If certification remains a requirement, we propose a more efficient approach, considering the nature of these components and the fact they often share similar testing parameters across different models. We suggest that TRC accept a family series application as applying for certifications for several models with identical reports leads to duplicated efforts and wastes valuable time for both authorities and companies. This would mean one application could cover several models (e.g., Cisco Switch N9K-C9504xxxx) which have been tested under identical conditions. The differences among these models are often limited to marketing names, colors, or storage capacity, not the technical specifications. It's worth noting that this process has been successfully implemented in neighboring countries, like Oman.</p> <p>Alternatively, we propose applying for a Regulatory Model certification and allowing updates to existing certificates for similar products using a similarity letter. This could be another efficient solution to the current process.</p>
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Additionally, We respectfully request that TRC exclude service parts (cables, power supplies, modules' etc.) from the type approval scope.

In conclusion, we believe these suggestions provide a balanced approach to maintaining high safety and reliability standards while also ensuring efficiency in the certification process. We appreciate TRC's dedication to continuous improvement and would like to thank you for providing us the opportunity to contribute to this public consultation. We look forward to further discussions and collaboration in the service of our shared objectives. Thank you once again for considering our perspective.