



National Information & Communication Technology Authority

RESPONSE TO THE RESPONDENT

WLAN Equipment

March 2017

Executive Summary:

NICTA published 6 consultation documents, amongst them the “*draft 3 WLAN Equipment*” in both daily newspapers on three different dates, seeking views and comments from the public and the stakeholder regarding content of the document. A period of two months, from 15/1/16 to 11/3/16 was set aside for consultation.

In line with the NICT ACT, the document consultation sought professional views and inputs from the ICT industry, stakeholders and individuals, hereby called respondents, their views and inputs were forwarded to NICTA by way of written submissions. These submissions were analysed by NICTA staff and responded to the respondents accordingly.

The Digicel PNG Ltd and Cambium Networks Limited, Australia, New Zealand and Pacific were the only respondents to this consultation paper. The summary of their response together with NICTA’s response are outline below.

NICTA would like to thank the respondents for their efforts in providing professional views, comments, and inputs to this document.

1. Purpose of this document:

- To review recommendations, comments and inputs received from the respondents.
- To provide NICTA’s response to the comments received.

2. Respondents:

2.1 Digicel PNG

2.2 Roy Wittert, Regional Sales Director – Cambium Networks Limited, Australia, New Zealand, and Pacific.

3. NICTA'S response to the respondents

3.1 Digicel PNG Ltd.

- a) COMMENT: Digicel supports all the requirements in this document and is particularly encouraged with the decision to follow the Australian Wi-Fi channel numbering plans in 5GHz band.

RESPONSE: NICTA wish to thank the Digicel PNG Ltd for their professional comments, views, and inputs.

3.2 Roy Wittert, Regional Sales Director – Cambium Networks Limited, Australia, New Zealand, and Pacific.

- (a) COMMENT: Cover page & sec 2.1- WLAN should not be restricted to indoor use only as it is now also generally used for outdoor hotspots as well.

RESPONSE: NICTA accepted this comment and has made appropriate changes to text in the document especially on the cover page, sections 2.1 and 5.1.

- (b) COMMENT: Sec 6 & 8 - We note that Wi-Fi Alliance (sect 8) approval is required. This process does take a long time. We are a new player and all our products are undergoing this process. Perhaps, there should just be a requirement to meet required emission specifications as per FCC and ETSI? (sec 6)

RESPONSE: NICTA does not restrict the type of Wi-Fi equipment to be employed as long as the product complies with its regulatory compliance standards. NICTA also understands that Wi-Fi Alliance certification is a process through which recognition is grant to a Wi-Fi product that met certain established requirements and; not every IEEE 802.11-compliant device is submitted for certification to the Wi-Fi Alliance, sometimes because of costs associated with the certification process. NICTA therefore, wishes to notify the Cambium Networks Ltd that apart from Wi-Fi Alliance NICTA will accept devices from certified Wi-Fi bodies and those bearing international recognised labels e.g. CE, RCM, FCC, IC etc. The reason for this is to ensure interoperability of different vendor products. NICTA amended the text in section 8 to cater for this.

In response to emission requirement as per FCC and ESTI", NICTA has provided standard in table 1, section 6.1 which sufficiently cover this.

(c) COMMENT: Sec 4.3 - All our products undergo Type Approvals as required. The required compliance as per Sec 6.1 is reasonable for now, but the requirement for per 4.3) NICTA will require the supplier and/ or dealer to submit sample WLAN equipment for testing together with copies of the user manual and technical specifications) will add significant delay and cost that is not in the best interest of the commercial development of PNG. 4.1, 4.2 and 4.4 should be the required process.

RESPONSE: In response to comment relating to section 4.3, NICTA appropriately provides for this in section 12 of the type approval guideline. In section 12.1 last paragraph, it states, “testing of device is subject to NICTA’s discretion”, this means that testing is not compulsory however NICTA may request the product to be tested at any time under suspicious circumstances. To conduct the test, NICTA will require the user manual and technical specifications without these the regulatory test will not be conducted. The manual and technical specifications can be easily zipped and emailed.

NICTA amended the text to make it uniform with the Type Approval Guideline.

(d) COMMENT: Sec 5.1 – Please explain what is the difference between WLAN and Wi-Fi?

RESPONSE: WLAN is a general term used to describe any wireless computer network that links two or more devices using a wireless distribution method and; WiFi is a type of WLAN that uses the 802.11 (abgn) families.

NICTA admits that the acronym WLAN used in the table of section 5.1 was typing error. NICTA appreciates the intention to correct the error and has made amends to this part.

(e) COMMENT: Sec 7 - Labelling requirements should also be kept as simple as possible. With at most a simple mark like ACMA RCM.

RESPONSE: Labelling requirements can be found in sections 14 and 15 of the Type Approval Guideline. NICTA accepts products with RCM, CE, FCC, IC labels. At present NICTA does not execute equipment/device labelling however in place of this document or administrative approval is practised. This is achieved by simply placing a NICTA registered insignia, the “N-Tick” also known as “NICTA Regulatory Compliance Mark” on the type approval certificate or document once a product meets all regulatory requirements. The N-Tick is an identification trademark registered under NICTA.