

Regulatory Update

ANATEL moves closer to mandatory IPv6 regulation

Dear customer,

PCS would like to forewarn you about ANATEL's progress towards mandatory IPv6 requirements for IPv6-capable devices in Brazil, which seems to be accelerating.

ANATEL are discussion internally and with key local entities – including OCDs, test laboratories and Brazilian Telcos/manufacturer groups – as well as the US Federal Communications Commission (FCC) – as they seek to create mandatory IPv6 requirements.

We expect that both new and renewal applications for Type Approval will be affected.

ANATEL's motives for moving toward IPv6 certification are likely two-fold:

- (i) Brazil will run out of public IPv4 addresses this year, creating urgent motivation to establish IPv6 products in the market which can be relied upon to comply and operate well, and
- (ii) Large customers of existing IPv6 capable devices in the Brazilian marketplace are complaining to ANATEL at the quality of IPv6 solutions being allowed onto the market.

A draft of IPv6 requirements (which mandates a series of IPv6-centric RFC criteria) is currently in preparation by the Regulator and under review by local entities.

Proposals are being submitted which hope to prompt discussion and aid a sensible approach to compliance checks.

A timescale for release of a final regulation is not clear:

OCDs and local labs attended a group discussion with ANATEL yesterday on this topic, yet there appears to be no consensus on when the new regulation will likely be issued;

“Mid-2014” was the impression given to one vendor, whilst another suggested that a 1 year window would be used to give manufacturers sufficient time to prepare.

It was also suggested international test reports would need to be accepted by ANATEL to demonstrate IPv6 compliance [owing to unrealistic demand on the Brazilian labs and the likely delays that would be seen, if the new regulation was brought into force immediately].

We understand ANATEL are discussing additionally with the FCC today.

A final list of affected product types is also not yet known.

We can advise that the initial draft regulations considered Category I devices (including Cellular smartphones and tablets, Telephone exchange equipment and Cable modems) only. Yesterday’s meeting between the labs and OCDs gave some of our suppliers the impression that Category II devices (including Access Points and WLAN-only client devices) may also be included in the list of affected products, so we are watching the situation very closely.

We welcome your questions about this important topic, and we will do our best to keep you abreast of the situation as it advances.

To confirm: no additional IPv6 regulations have been issued yet by ANATEL. This Regulatory Update aims to provide advance warning, to allow for internal risk evaluation by PCS customers, and to allow discussion and questions.

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Date of Issue: 19 March 2014