



From the desk of the TC-ERM Chairman

To - Heads of National ETSI Delegations

Copy for information – ETSI Board members, AIG members.

**Revision of the Automotive EMC (ElectroMagnetic Compatibility) Directive
(95/54/EC)**

Radio and Information Technology equipment and their EMC conformity assessment

Ladies and Gentlemen,

ETSI TC-ERM requests your assistance in resolving overlapping regulatory requirements related to the application of the R&TTE Directive 99/5/EC, the EMC Directive 89/336/EEC and the Automotive EMC Directive 95/54/EC. The requirements of the Automotive EMC Directive lead to double certification and double testing of radiocommunication products intended for installation and use in vehicles, which in addition uses a more onerous approval regime.

Triggered by many questions and complaints regarding the applicability of the Automotive EMC Directive 95/54/EC to the installation of after market products in vehicles, the European Commission decided to perform an independent study for analysing the problems that had been raised. The final study report from York EMC Services sets out the existing difficulties with the Directive and proposes several ways forward for future improvements. As a result, DG Enterprise decided to launch a process to amend Directive 95/54/EC. For this purpose, in January 2002, DG Enterprise - Automotive Industry, convened an ad hoc group with representation from interested Member States and selected industry associations. ETSI was invited to take part in this work through its Task Group ERM-TG04, which deals with "Automotive EMC".

At the first meeting of the Commission's ad hoc group, ETSI proposed that radiocommunication equipment already certified and CE Marked for EMC, under the EMC and R&TTE Directives should be accepted to have fulfilled the EMC requirements of Automotive EMC Directive. It is important to note that the harmonised standards (prepared by ETSI and CENELEC) under the EMC and R&TTE Directives take into account all environments, in which a product is intended to be used, this includes the vehicle environment. Since radiocommunications products are not involved in direct control functions of the vehicle, there is no justification for a repeated EMC assessment under the type approval regime of Directive 95/54/EC, which in turn appears as an obstacle to free access of products to the market.

DG Enterprise made it clear that changing Directive 95/54/EC, to accept the CE-mark, for the certification of equipment, not involved in direct control functions of the vehicle, requires strong support from Member States and may require the application of formal procedures for revision of the Directive through the European Parliament.

In the Commission ad hoc group the Member States representatives are mainly from the Ministries of Transport. As a consequence, there is little support to change Directive 95/54/EC to accept CE-marked products, since these fall under the regulations of a different i.e. the telecommunications, sector.

Radiocommunication products and services form an integral part of our daily lives and contribute to the electromagnetic environment, which includes public roads. It is therefore relevant to take full account of the needs of the telecommunications community in respect of the EMC aspects of vehicles. ETSI TC-ERM considers it essential that the view of the National radio and telecommunication authorities are taken fully into account in the revision of Directive 95/54/EC, since a very large proportion of licensed radiocommunication products and services are potentially affected.

TC-ERM is thus asking for active support in order to achieve the necessary changes to Directive 95/54/EC, during this revision period. We would therefore ask that the concerns of the telecommunications industry be raised at National level with the Ministries of Transport, and where appropriate lobby at European level. The objective is to achieve a regulatory environment, which takes into account, in a more balanced way, the needs of all the market-players involved.

Mr Schneider, who is from the Automotive Industries Directorate in DG Enterprise, chairs the Commission ad hoc group, and the next ad hoc meeting is to be held in Brussels on 27-28 May 2002.

For further information please visit the ETSI web site under [ERM-TG04](#) and/or contact the group's chairman, Mr. Detlev Aust. (Detlev.Aust@nokia.com).

With kind regards,

Olly Wheaton

Chairman TC-ERM