



Commission

Type Approval Regulatory Framework, 2022

Consultation Document

Consultation

Public consultation date: 14 March 2022

Closing date for responses: 11 April 2022

Reference Number: 01/2022

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1. Introduction

The Telecommunications Regulatory Commission of the Virgin Islands (hereafter: Commission) is a statutory body with responsibility for the development and regulation of the telecommunications services industry. As part of this mandate and specifically as it relates to Equipment Type Approval and other telecommunications equipment, the Commission is obliged to ensure terminal equipment that are otherwise sold in the Virgin Islands (hereafter: VI) are safe for users and comply with regulatory and adopted technical standards in accordance with section 42 of the Telecommunications Act, 2006¹. It is therefore necessary for radio products and peripherals that are destined for the VI to support the wider Commission objectives in the enhancement of telecommunications services. For this reason, the Commission has decided to draft a specific Type Approval Regulatory Framework for radio products and peripherals (hereafter: TARF). The TARF will be a Code that governs the Commission's Type Approval regime and will satisfy the requirements of section 42 of the Telecommunications Act.

The specific objectives of the TARF are to ensure public safety, authorise sales, compatibility and interoperability between public networks, health and safety, and compliance with the national spectrum plan.

The TARF will be applicable to all electronic, electric and radio equipment (transmitting and/or receiving).

With this consultation document (Consultation 1) the Commission solicits stakeholders' views on the objectives that the Commission wants to achieve with the TARF as well as on its the structure.

The results of this public consultation will be taken into consideration when drafting the detailed content of the TARF. The TARF itself will be consulted in a next consultation round (Consultation 2).

This consultation document is divided in sections addressing the different aspects of the TARF followed by specific questions to the stakeholders to express their views. The last page of this consultation is reserved for general questions and remarks not addressed in the specific sections.

2. Instructions for submitting a response to the consultation

The Commission invites all interested parties' comments to this consultation document. Comments should be submitted by [11 April 2022].

The Commission strongly prefers responses to this document to be sent by email to consultations@trc.vg, indicating the subject: "Type Approval Regulatory Framework". Alternatively, the responses may be sent to the address (or the P.O Box number) set out below:

Consultation on the Type Approval Regulatory Framework – Telecommunications Regulatory Commission, P.O. Box 4401 or 27 Fish Lock Road, 3rd Floor Road Town, Tortola, British Virgin Islands VG 1110.

Responses from corporate bodies (legal persons) should include:

- The name of the company/institution/association/other organisation;
- The name of a principal contact person;

¹ The Telecommunications Act, 2006 can be found on the Commission's website at <https://www.trc.vg/documents/telecommunications-act/>.

- Full contact details (physical address, postal address, telephone number, fax number and email address); and
- For each response a reference to the related consultation question. For this reason, the questions are numbered.

The Commission has produced a sheet for responses (see Annex 1) and would be very grateful to send one with your responses. This will speed up the processing of the responses and help to maintain confidentiality where appropriate.

In the interest of transparency, the Commission will make all submissions received available to the public, subject to the confidentiality of the information received. The Commission will evaluate requests for confidentiality according to relevant legal principles.

Respondents are required to mark any information included in their submission that they consider confidential and provide reasons why that information should be treated as such. Where a statement claimed to be confidential is included in a submission, respondents are required to provide both a confidential and a non-confidential version of their submission. The Commission will determine whether information claimed to be confidential is to be treated as such and, if so, will not publish that information. Regarding information that is determined to be non-confidential, the Commission may publish or refrain from publishing such information at its sole discretion (see also Annex 1).

3. Objectives of the TARF

The Commission has adopted six essential regulation principles consistent with international standards and best practices: accountability, focus, predictability, adaptability, efficiency, and balance. The introduction of the TARF complements these principles. With the TARF, the Commission pursues the following objectives²:

1. Guaranteeing compatibility and interoperability between public networks;

Addressing needs for interconnection and interoperability is particularly important for open markets, where mobile users can ‘mix and match’ equipment and services and where suppliers can benefit from economies of scale. This means that a product bought in country X also works in the same manner in the VI.

2. Ensuring safety, reliability, and environmental care;

This usually means that the product is manufactured using safe materials and in such a way that the safety of the user is guaranteed at a certain level. This includes Electromagnetic Compatibility (EMC) and Electromagnetic Fields (EMF) aspects;

3. Protecting the interests of users and businesses;

Providing a reference to protect user and business interests and support government policies. A stable guide on implementing the rules is essential for manufacturers to put their products on the market and gives the regulator a basis for testing and assessing equipment against the requirements of the national spectrum plan and other regulations. At a certain level, this guarantees that, for example, no interference is caused to other radio communication systems when the product is in use.

² Source: <https://www.etsi.org/standards/why-standards>.

Question 1:

Do you have any comments, remarks, suggestions and/or questions on the objectives of the TARF?

4. Definitions to be used in the TARF

The TARF will contain many terms that are not defined in the Telecommunications Act nor in bylaws. For reasons of clarity, the TARF will have to contain several definitions that are commonly used in the Type Approval domain. The following list of definitions, which are in line with definitions, is taken from or based upon the Federal Communications Commission of the USA and definitions of the European Union, and intended to be included in the TARF:

- **Compliance:** Compliance is expressed with respect to standards and compliance to that standard gives a presumption of conformance to applicable legislation.
- **Declaration of Conformity:** A Declaration of Conformity (DoC) indicates that a product complies to all the requirements of VI product legislation. It is a legal document which must accompany all products sold or traded in the VI.

Note: a template of a DoC will be included in the TARF.

- **Economic Operator:** An economic operator is an entity established in the customs territory of the VI and part of the international supply chain and involved in customs related operations.
- **Foreseeable use** is the expected use of an electric, electric, radio or combined device under normal circumstances.
- **Generic standard:** A standard intended to provide compliance for a range of products.
- **Importer:** a person or company that buys goods from another country with the intention to sell them in the VI or use for its own personal purposes.
- **Importing:** buying goods from another country with the intention to sell them in the VI or use for its own personal purposes.
- **Placing on the market:** A product is placed on the market as soon as it enters the storage of the national distributor located in the VI.
- **Product specific standard:** A standard intend to provide compliance for a single product or a limited number of products.
- **Putting into service:** A product is put into service if the product, other than an investigational product, has been made available to the final user as being ready for use for its intended purpose on the market for the first time.
- **Radio interface:** The specification of the regulated use of the spectrum.
- **Technical Construction File:** A Technical Construction File (TCF) compiled by the manufacturer of a product that demonstrates that the product meets the requirements of the applicable guidelines and regulation.

Note: a template of a table of contents of a TCF will be included in the TARF.

- **Test laboratory/body:** An institute notified or recognised by the Commission to test compliance of radio products and peripherals.

Question 2:

Do you have any comments, remarks, suggestions, and/or questions on the definitions to be used in the TARF?

5. Regulatory aspects

5.1. General aspects

The TARF will make the Type Approval (TA) Regulations of the Federal Communication Commission (FCC) of the USA the de facto regulations for equipment, making use of frequency bands that are license exempt (hereafter: license exempt equipment). The frequency bands for which other TA Regulations are required will be listed in the TARF. These TA Regulations will be most obvious the European Community (EC) TA Regulations. For licenced equipment both FCC and EC TA Regulations, including marking, can be used.

TA from other countries is not excluded but, in those cases, a Technical Construction File needs to be submitted together with a Declaration of Conformity. These documents need to prove that the product complies with the FCC and EU EMC regulations, that the product complies with the EMF exposure limits as set in the International Commission for Non-Ionizing Radiation Protection (ICNIRP) 2020 guidelines for limiting exposure to electromagnetic fields (100 kHz - 300 GHz)³ and interoperability is guaranteed according to standards of International Telecommunications (ITU) for Region 2⁴. The TARF will contain several clauses dealing with these topics.

The TARF will include a clause that states that the Commission may take samples of products to perform tests to check if proper TA procedures have been followed. Resulting costs will be borne by the manufacturer and will be kept at a minimum.

The TARF will include a clause that states that the Commission may confiscate equipment or may demand switching-off equipment that does not comply with the TARF or causes interference for another reason, with a reference to Part X, Clause 49.1(c) of the Telecommunications Act.

Question 3:

Do you have any comments remarks, suggestions, and/or questions on the general aspects of the TARF?

5.2. Interoperability standards

Interoperability standards such as standards from 3GPP⁵, IEEE⁶, ETSI⁷ standards, are recognised in the VI but not formally embedded in regulations. Therefore, there will be a requirement in the TARF that states that all equipment need to meet the interoperability requirements from either the FCC or the EU.

³ See: <https://www.icnirp.org/cms/upload/publications/ICNIRPrfql2020.pdf>

⁴ The VI are located in ITU Region 2 (the Americas), see <https://www.itu.int/en/ITU-R/information/Pages/emergency-bands.aspx>. Given its proximity to the US, the Virgin Islands will follow Region 2 (US) band plans unless it is in the Territory's economic or social interest to do otherwise, see <https://www.trc.vg/top-box/spectrum-management-framework/>.

⁵ 3GPP stands for 3rd Generation Partnership Program. 3GPP Technical Specification Groups define amongst other technical specifications for Radio Access Networks for fourth generation (4G) and fifth generation (5G) of mobile technology.

⁶ IEEE stands for the Institute of Electrical and Electronics Engineers.

⁷ ETSI stands for European Telecommunications Standards Institute. It is one of the three by the European Commission recognised standardisation organisations.

Question 4:

Do you have any comments remarks, suggestions, and/or questions on the Interoperability requirements?

5.3. Combined Equipment

Combined Equipment is equipment not intended to work as a radio device but with either one or more radio devices incorporated in the equipment, or one or more radio devices permanently fixed to the equipment. Examples are cars with several radio devices such as radar, remote control for alarm and tire pressure sensors. Also, refrigerators, or washing machines with built in WIFI devices fall under this category. The Combined Equipment is considered to be one single product (the product).

The TARF will deal with Combined Equipment as follows:

There are two situations:

1. When radio equipment, that was not placed on the VI market, is included in or attached to a non-radio product the Economic Operator who is placing the product on the VI market shall be considered as the manufacturer and shall follow the obligations mentioned below;
2. When radio equipment, that is already placed on the VI market, is included in, or attached to a non-electrical product the Economic Operator who is placing the product on the VI market, shall be considered as the manufacturer and shall follow the obligations mentioned below if the intended function or performance of the electrical/electronic equipment is modified or the compliance is impacted.

Obligations applicable for situation 1 and 2:

- Compliance of the radio equipment with the TARF shall be determined and ensured;
- A risk assessment of the radio equipment shall address its intended use by ensuring that, when it operates in combination with the intended non radio product, the conformity of the product is fulfilled;
- The equipment marking, see also section 0, shall be affixed on the non-electrical product, or the equipment marking shall be placed on the packaging as well as the accompanying documents in relation to the product (i.e., passes on the product);
- The equipment marking shall also be affixed on the radio equipment unless it is not possible to affix the equipment marking on the equipment or it cannot be ensured that the equipment marking, if affixed on the equipment, will be visible, legible, and indelible;
- Contact details and any required information shall be affixed on the radio equipment. Where it is not possible to affix the contact details and any required information on the radio equipment, they shall be affixed on the non-electrical product, or they shall be provided on the packaging or the accompanying documents in relation to the product (i.e., passes on the product).

Question 5:

Do you have any comments remarks, suggestions, and/or questions on the obligations imposed on Economic Operators of Combined Equipment?

Question 6:

Do you currently import combined equipment and, if so, how do you currently make sure the radio devices of the combined equipment comply with the relevant regulations amongst which are the Spectrum Management Framework and the National Frequency Allocation Table?

5.4. EMC

Electromagnetic compatibility (EMC) is the ability of electrical equipment and systems to function acceptably in their electromagnetic environment by limiting the unintentional generation, propagation and reception of electromagnetic energy. This may cause unwanted effects such as electromagnetic interference (EMI) or even physical damage to operational equipment⁸. The goal of EMC is the correct operation of different equipment in a shared electromagnetic environment.

EMC works in two ways; a device that is not intended to radiate should radiate as minimal as possible. However, this cannot wholly be avoided since shielding has physical limitations and high-frequency electronics such as high-speed microprocessors always generate a certain amount of electromagnetic radiation. This is called electromagnetic interference or EMI.

On the other hand, a device that is not designed to receive should be as resistant to electromagnetic radiation as possible. This is called electromagnetic susceptibility or EMS.

All equipment should be EMC compliant. Since there is a mutual agreement between the USA and the EU about EMC⁹, it does not matter if the equipment is tested using the USA or EU TA regulations when it comes to marking. This is already current practice in the VI but not formalised. Since most equipment is FCC approved, there should be no issue. However, reference to EMC in the TARF is to the Commission's opinion required.

EMC testing will be included in the TARF and will be based on FCC or EC standards.

Question 7:

Do you have any comments, remarks, suggestions and/or questions on obligatory EMC testing, based on FCC or EC standards, of equipment, that will be imported into the VI?

5.5. EMF

Electric and Magnetic Fields (EMFs) are invisible areas of energy, often referred to as radiation, associated with the use of electrical power. Everyone is exposed to a complex mix of weak EMF at home and at work, from the generation and transmission of electricity, domestic appliances and industrial equipment to telecommunications and broadcasting. To date, no adverse health effects from low level, long-term exposure to radiofrequency or power frequency fields have been confirmed, but scientists are actively continuing to research this area¹⁰. In addition, the International Commission of Non-Ionizing Radiation Protection (ICNIRP) has set exposure limits for EMF in its 1998 guidelines, which

⁸ Source: DIN EN 61000-2-2 VDE 0839-2-2:2003-02 - Electromagnetic compatibility (EMC). VDE. 2003.

⁹ See https://ec.europa.eu/growth/single-market/goods/international-aspects/mutual-recognition-agreements_en For the agreement itself see [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:01999A0204\(01\)-20200205&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:01999A0204(01)-20200205&from=EN)

¹⁰ Source: <https://www.who.int/news-room/q-a-detail/radiation-electromagnetic-fields>.

were recently replaced by ICNIRP's 2020 guidelines¹¹. These are worldwide accepted and most used exposure limits to EMF¹².

For EMF TA, the type of equipment (i.e., end-user equipment or network equipment) is essential. End-user equipment can be EMF type-approved in a test laboratory. Network equipment that has to be installed (e.g., base stations) cannot be EMF type-approved in advance. The owner of the network equipment has to install the equipment at hand, including setting the parameters of the transmitter(s) and antenna(s) based on the radio planning of the network and subsequently make an EMF assessment¹³ to determine the exclusion zone¹⁴ in which members of the general public are not allowed to enter.

EMF TA focuses on licence-exempt equipment and is usually part of the standard TA procedure based on the intended and foreseeable use of the equipment. For licence-exempt equipment, a power limit of 25 mW, e.i.r.p. is considered intrinsically safe, and no further testing is needed. VI already applies the exposure limits of ICNIRP (2020) guidelines¹⁵. These are worldwide accepted and the most used exposure limits of EMF¹⁶. EU standards and most FCC standards are also based on the ICNIRP exposure limits¹⁷.

Question 8:

Do you have any comments, remarks, suggestions and/or questions to the use of the ICNIRP 2020 exposure limits for licence-exempt equipment with an e.i.r.p. of larger than or equal to 25 mW e.i.r.p.

6. Enforcement

It is unavoidable that equipment that has not been type-approved will enter the market despite having a proper TA regime. These are usually 'self-imported' devices by individual citizens or devices on visiting (cruise) ships, which were type-approved in their ITU Region, and are using frequency bands not allocated to this particular radiocommunication service in the VI¹⁸.

Part VII clause 38 (1) of the Telecommunications Act clearly states that no person shall operate any facility, terminal equipment, or other equipment in a manner likely to cause harmful interference. The definition of harmful interference in the Telecommunications Act: 'harmful interference' means interference with the authorised use of spectrum that impedes, degrades, obstructs or interrupts a

¹¹ The ICNIRP guidelines can be found at: <https://www.icnirp.org/en/activities/news/news-article/rf-guidelines-2020-published.html>.

¹² Currently 156 countries are applying the ICNIRP guidelines (1998 or 2020), see <https://www.gsma.com/publicpolicy/emf-and-health/emf-policy>.

¹³ An EMF assessment shall include the following methods: a) EMF calculations based on recognized international standards; or b) EMF measurements based on recognized international standards. Both for calculations and for measurements examples of recognized international standards are IEC 62232, IEC 62669 and IEC 62311 or equivalent ITU standards. See also: <https://www.citc.gov.sa/en/new/publicConsultation/Pages/144210.aspx>.

¹⁴ Within the exclusion zone, the exposure levels of EMF are higher than the ICNIRP reference levels which implies that there might be adverse health effects.

¹⁵ The ICNIRP guidelines can be found at: <https://www.icnirp.org/en/activities/news/news-article/rf-guidelines-2020-published.html>.

¹⁶ Currently 156 countries are applying the ICNIRP guidelines (1998 or 2020), see <https://www.gsma.com/publicpolicy/emf-and-health/emf-policy>.

¹⁷ FCC has based its EMF Regulations on IEEE exposure limits. These are practically like the ICNIRP exposure limits.

¹⁸ An example are cruise ships which are using the European DECT system. The equipment is most likely type-approved but interferes with mobile communications in the VI.

broadcasting service or a radiocommunication service¹⁹. This definition is not fully aligned with the definition of the ITU²⁰.

According to the ITU Radio Regulations, there may also be cases where interference is caused, which is not classified as harmful: legitimate spectrum users may cause this type of interference in specific cases²¹. The new Type Approval Regulatory Framework should provide possibilities to allow the Commission to act in these cases.

Question 9:

Do you have any comments, remarks, suggestions and/or questions to include in the TARF that the Commission may confiscate equipment or demand switching-off equipment that does not comply with the TARF or causes interference that the ITU does not classify as harmful?

7. Importation of equipment and placing on the market

7.1. General aspects

Individuals and Economic Operators import radio equipment and communication peripherals into the VI. The TARF will address importation by individuals, companies and manufacturers and will state who is responsible for TA of imported electronic, electric and radio equipment.

In the TARF, the current Type Approval Registration Portal²² will be made mandatory for importers.

In the case of importation of radio equipment and communication peripherals for personal use, the consumer will be informed about the relevant aspects of the TARF especially on how to recognise and identify a type approved device. Customs will be more intensively involved in keeping non-compliant devices from entering the VI.

Question 10:

Do you have any comments, remarks, suggestions and/or questions on the importation and placing on the market of radio equipment and communication peripherals?

Question 11:

Do you import electric, electronic and or radio equipment in the VI? If so, do you have suggestions to improve the importation process through the TARF?

7.2. Equipment marking

The FCC marking will be the de facto standard for radio equipment in the TARF. A specific clause in the TARF will explain the deviation from the FCC regulations in a few particular cases, which are not covered in the FCC regulations. A specific VI marking could overcome this, but a separate TA for all imported

¹⁹ The ITU defines various types of interference in the Radio Regulations Volume 1 Article 1 clauses 1.166 – 1.169, see <https://www.itu.int/pub/R-REG-RR-2020>

²⁰ The definition of ITU is 'Interference which endangers the functioning of a radio navigation service or other safety services or seriously degrades, obstructs, or repeatedly interrupts a radiocommunication service operating in accordance with the ITU Radio Regulations'

²¹ An example is a Type Approved device, like a radio amateur transmitter, that is used differently from the foreseeable use and interferes remote controls for keyless car entry.

²² See <https://trc.spectrum.center/se/login>.

equipment is needed. This will result in extra costs for the manufacturer and will likely lead to lower availability of products in the VI. For EMC and EMF both FCC or CE marking may be used.

Question 12:

Do you have any comments, remarks, suggestions and/or questions to equipment marking?

Question 13:

Do you see any benefit for a specific VI equipment marking? If so, would you be willing to pay (additional) fees for this?

8. TA Responsibilities

The TARF will make clear when TA needs to take place and who is responsible for it. A product must comply with the requirements set out in the TARF as soon as it is placed on the market. It is the manufacturer's responsibility to determine which specific requirements are applicable and provide the Declaration of Conformity or the Technical Construction File, see for the definitions of these terms section 4, approved by a TA Notified Body²³.

The importer needs to verify if all documents are in order before importing equipment in the VI.

The seller of the equipment also has the responsibility to verify if all type approval requirements are met before selling the equipment. This will be also required for combined equipment.

Question 14:

Do you have any comments, remarks, suggestions and/or questions on responsibilities?

9. Cyber Security

Cyber security requirements for government acquired equipment are in place in the United States, and cyber security requirements for user equipment will be activated in the EU before 2024. Therefore, cyber security requirements will be included in the TARF and cover both government acquired and user equipment.

Question 15:

Do you have any comments, remarks, suggestions and/or questions on requirements for Cyber Security?

²³ A Notified Body is an organisation designated by a country to assess the conformity of certain products before being placed on the market. These bodies carry out tasks related to conformity assessment procedures set out in the applicable legislation when a third party is required. In the European Union, the European Commission publishes a list of such notified bodies, see https://ec.europa.eu/growth/single-market/goods/building-blocks/notified-bodies_en. In the USA, a list of Telecommunications Certification Bodies can be found at <https://apps.fcc.gov/oetcf/tcb/reports/TCBSearch.cfm>.

10. Fees

The Commission will develop a methodology to recover the costs incurred by the Commission and other governmental organizations, like Customs, for TA and use this methodology to determine the appropriate fees.

Question 16:

Do you have any comments, remarks, suggestions and/or questions on the methodology to recover the administrative costs?

11. General remarks, suggestions and/or questions on the TARF

Next to responding to the specific consultation questions stated above, the Commission also welcomes any general remark, suggestion, or question you may have on the TARF.

Question 17:

Do you have any general remarks, suggestions and/or questions on the TARF?

Annex 1: Sheet for responses to the Public Consultation

BASIC DETAILS:

Consultation title:

To (Commission Contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below which part of your response you consider is confidential, giving your reasons why

Nothing Name/contact details/job title

Whole response Organisation

Part of the response Details of Confidential Information

Suppose you want part of your response, your name or your organisation not to be published. In that case, we can still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that the Commission can publish. However, in providing this response, I understand that the Commission may need to publish all responses, including those marked as confidential, to meet legal obligations. Therefore, if I have sent my response by email, the Commission can disregard any standard email text about not disclosing email contents and attachments.

The Commission seeks to publish responses on receipt. However, if your response is non-confidential (in whole or part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

Number	Question	Responses, comments, remarks, suggestions
1	Do you have any comments, remarks, suggestions on the objectives of the TARF?	
2	Do you have any comments, remarks, suggestions, and/or questions on the definitions to be used in the TARF?	
3	Do you have any comments remarks, suggestions, and/or questions on the general aspects of the TARF?	
4	Do you have any comments remarks, suggestions, and/or questions on the Interoperability requirements?	
5	Do you have any comments remarks, suggestions, and/or questions on the obligations imposed on Economic Operators of Combined Equipment?	
6	Do you currently import combined equipment and, if so, how do you currently make sure the radio devices of the combined equipment comply with the relevant regulations amongst which are the Spectrum Management Framework and the National Frequency Allocation Table?	
7	Do you have any comments, remarks, suggestions and/or questions on obligatory EMC testing, based on FCC or EC standards, of equipment, that will be imported into the VI?	
8	Do you have any comments, remarks, suggestions and/or questions to the use of the ICNIRP 2020 exposure limits for licence-exempt equipment with an e.i.r.p. of larger than or equal to 25 mW e.i.r.p.	
9	Do you have any comments, remarks, suggestions and/or questions to include in the TARF that the Commission may confiscate equipment	

Number	Question	Responses, comments, remarks, suggestions
	or demand switching-off equipment that does not comply with the TARF or causes interference that the ITU does not classify as harmful?	
10	Do you have any comments, remarks, suggestions and/or questions on the importation and placing on the market of radio equipment and communication peripherals?	
11	Do you import electric, electronic and or radio equipment in the VI? If so, do you have suggestions to improve the importation process through the TARF?	
12	Do you have any comments, remarks, suggestions and/or questions to equipment marking?	
13	Do you see any benefit for a specific VI equipment marking? If so, would you be willing to pay (additional) fees for this?	
14	Do you have any comments, remarks, suggestions and/or questions on responsibilities?	
15	Do you have any comments, remarks, suggestions and/or questions on requirements for Cyber Security?	
16	Do you have any comments, remarks, suggestions and/or questions on the methodology to recover the administrative costs?	
17	Do you have any general remarks, suggestions and/or questions on the TARF?	