



The Director General

Mr Gwenole Cozigou,
Director Resources Based, Manufacturing
and Consumer Goods Industries,
DG Enterprise and Industry,
Avenue d'Auderghem 45,
1049 Brussels,
Belgium.

Brussels, 22 October 2014

Re: Possible solutions securing presumption of conformity to the automation industry in view of the Workshop on Wireless Resources for Advanced Manufacturing

Dear Sir,

Orgalime would like to thank the European Commission for its ongoing efforts to find a solution regarding [EN 300 328 v.1.8.1](#) that would accommodate the needs of the automation industry, one of the sectors where European technology leads the world.

This letter aims to suggest a possible, short-term solution that could be discussed during the Commission's workshop on Wireless Resources for Advanced Manufacturing.

Standard EN 300 328 grants presumption of conformity to the R&TTED for the efficient use of the spectrum to equipment operating in the 2.4 GHz ISM* frequency band, a very successful band shared by a large number of innovative devices.

The [previous version of the standard \(v.1.7.1\)](#), which will cease to provide presumption of conformity on **31 December 2014**, fits the needs of the automation industry but unfortunately, the automatic adaptivity mechanisms, such as for example "Listen Before Talk" foreseen in the latest revision of the standard, [EN 300 328 v.1.8.1](#), if applied to the automation industry, stand to negatively affect the operation of automated manufacturing chains and machinery, process safety and energy consumption. Consequently, we fear that this will represent an obstacle to innovation and to the full deployment of advanced manufacturing technologies which we believe are an essential part of the recovery of Europe's manufacturing economy.

Given the impossibility to arrive at a satisfactory solution in time through further standardisation work, we feel that a possible, short-term solution, could be to grant presumption of conformity to additional technical solutions by referencing them as a footnote under the R&TTED and [EN 300 328 v.1.8.1](#) in the Official Journal of the EU (OJEU).

In particular, manufacturers of industrial automation equipment suggest maintaining the option for devices with up to 100mW transmit power to work in a non-adaptive mode, as is the current practice in most factories in Europe and around the world, provided that they are installed within a spatially delimited 10 metre area. This 10-metre "virtual wall" would ensure that the signal level at its boundaries is equal to the signal of a device with 10mW transmit power, thus fulfilling the legal requirements of the R&TTED.

The European Engineering Industries Association

Such a temporary solution would leave time for the automation industry to provide the necessary expertise for a suitable solution in a revised version of the standard. Therefore, we hope that it would be taken into consideration during the experts' discussion in the Commission's Workshop on Wireless Resources for Advanced Manufacturing on 30 of October.

Thanking you in advance for considering the possible solution we propose and for your support,

With best regards,



Adrian Harris

Cc: Mr Girao, Mrs Weidel, Mr Del Colombo

* 2.4GHz ISM – One of the frequency bands reserved for Industrial, Scientific and Medical applications, excluding applications in the field of telecommunications.