

Ronald Reagan Presidential Library

Digital Library Collections

This is a PDF of a folder from our textual collections.

Collection: Driggs, Michael, A.: Files
Folder Title: Telecommunications: Japan's
Compliance Approval Scheme
Box: OA 12247

To see more digitized collections visit:

<https://reaganlibrary.gov/archives/digital-library>

To see all Ronald Reagan Presidential Library inventories visit:

<https://reaganlibrary.gov/document-collection>

Contact a reference archivist at: reagan.library@nara.gov

Citation Guidelines: <https://reaganlibrary.gov/citing>

National Archives Catalogue: <https://catalog.archives.gov/>

Last Updated: 03/03/2023

29 January 1985, Tokyo

Important points

U.S. GOVERNMENT PAPER
ON THE
GOVERNMENT OF JAPAN'S PLANS
FOR A
COMPLIANCE-APPROVAL SCHEME FOR
TELECOMMUNICATIONS TERMINAL EQUIPMENT

Issues

Among the issues that concern the U.S. Government are:

1. Limited coverage of the new compliance-approval scheme;
2. Japanese manufacturers' control of the approval institute;
3. Method of issuing approvals;
4. Basis of the compliance-approval scheme -- individual approval;
5. NTT's own approval scheme;
6. Lack of transparency during standards drafting; and
7. Issuance of redundant conformity seals by MPT, NTT and MITI.

1. LIMITED COVERAGE OF NEW COMPLIANCE-APPROVAL SCHEME

Problem: The new scheme will be limited to customer-provided terminal equipment attached to the 'analog' Public Switched Telephone Network (PSTN). Therefore, equipment that is leased from NTT will NOT be covered by the new scheme. Furthermore, not all equipment for the PSTN is covered, eg. 'private branch exchanges' (PBXs) of over 50 lines (a U.S. product) are to be excluded from the scheme's coverage and, therefore, must be inspected and certified by Class I carriers, such as NTT. In addition, some of MPT's standards may go beyond ensuring against harm to the network.

Goal:

- The new scheme should cover all terminal equipment -- whether leased or bought. In addition, the new scheme should include the entire PSTN, which is a mixture of analog and digital.
- Coverage under the scheme of all equipment attached to the PSTN.
- MPT standards should be less stringent than NTT's current specifications and only cover interface circuitry criteria that protect against harm to the network.

2. JAPANESE MANUFACTURERS' APPROVAL INSTITUTE

Problem: The entity that will be delegated the responsibility for approving terminal equipment will most likely be the "Japan Approvals Institute for Terminal Equipment" (JATE), whose board of directors and inspectors consist of personnel from Japanese equipment manufacturers and users.

Goal:

- Examination of applications directly by MPT.
- As an alternative, issuance of approvals by a truly independent institute whose board of directors and inspectors are NOT representatives from Japanese producers, banks or telecommunications carriers.

3. METHOD OF EXAMINATION

Problem: In addition to accepting test data generated in the United States, the approval institute may conduct its own product testing. Clear criteria under which such tests would take place have not been specified.

Goal:

- Examination of applications based SOLELY on a check of test data in documents.
- Actual testing of products only after evidence of actual harm to the network.

4. BASIS OF COMPLIANCE-APPROVAL SCHEME

Problem: MPT will only issue "conformity seals" for a specific number of terminals. Requests for additional seals will require an entirely new application, although the equipment remains unchanged.

MPT's planned system violates the 4-year old "Joint Statement on Interconnect Issues", which is an integral part of the NTT Agreement between the US and Japan.

The legal basis of MPT's examination scheme is an "individual approval system". That literally means that MPT has the right to examine EACH piece of equipment. This right is based on the legal argument that MPT only has authority to regulate the telephone network (and not telephone equipment). It is also based on a rivalry with MITI, which has the authority to regulate equipment.

- MPT compliance with the Government of Japan's obligation in the Joint Statement to "...make type approval available for all classes of customer-provided interconnect equipment."

- Adoption of a method of approving equipment that does not require re-application for additional "conformity seals", but under which the manufacturer may produce and apply the seals, (which are based on a standard design) after receiving type approval.

5. NTT'S SCHEME

Problem: NTT will have the right to inspect terminal equipment and need not obtain approval from the new institute.

Goal:

- The new institute should examine all equipment to be attached to the PSTN.

- NTT's equipment should not be exempted from examination by the new institute.

6. LACK OF TRANSPARENCY

Problem: U.S. suppliers may not have an opportunity to comment at a meaningful point in the drafting of MPT's technical standards and requirements. In the Second Trade Package (May 1982), the Government of Japan unilaterally declared that "...foreigners would be permitted to participate in standards drafting committees". This commitment was repeated in the "GOTODA REPORT" (of March, 1983).

Goal:

- MPT's publication of an annual calendar of planned technical drafting activities.

- MPT's publication of draft technical standards and requirements for public comment before MPT complies with its statutory obligation to seek the advice of advisory committees.

7. REDUNDANT CONFORMITY SEALS

Problem: Terminal equipment may have to bear five different seals in the future, at present only NTT's seal is required. In addition to a seal from MPT, MITI is considering issuing conformity seals for (1) industrial quality, (2) product design and (3) electrical safety. NTT also retains the authority to issue its own seal.

Goal:

- Adoption of a SINGLE SET of standards and reliance upon a SINGLE conformity seal.