



April 3, 2009

Mr. Timothy P. Stratford
Assistant U.S. Trade Representative for China Affairs
Office of the U.S. Trade Representative
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Office of Market Access and Industrial Competitiveness
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U.S. Department of Commerce
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Julius Knapp
Chief
Office of Engineering and Technology
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear U.S. Government Colleagues:

On behalf of TIA and its 500 member manufacturers of telecommunications equipment, I want to express our support for the negotiation of a Mutual Recognition Agreement for testing and certification between the United States and China under the APEC TEL MRA framework agreement. MRAs are important mechanisms that help speed the entry of new technologies into markets; reduce technical barriers to trade; provides a mechanism

that fosters long-term cooperation on conformity assessment; and helps to develop appreciation for the development and use of international standards. We applaud the U.S. government for taking the initiative in an effort that, if successful, will benefit our information and communication technology companies greatly.

With trade facilitation in mind, TIA and its members believe an MRA with the widest possible scope is essential to provide future flexibility for entry of new products as well as to minimize the potential for interpretation of covered vs. non-covered products by the Chinese government – a result which could possibly increase, rather than reduce, technical barriers to trade. However, if the scope of the agreement is narrower to accommodate different governmental structures or procedures, TIA members have identified the equipment listed below as important for inclusion in the MRA. Furthermore, we support the MRA covering Electromagnetic Compatibility (EMC), safety, and radio regulations for the products listed.

- 3G Technologies
- Bluetooth
- CDMA Network Equipment
- Communications Systems for Businesses and Governmental Agencies
- GSM Network Equipment
- GPRS
- Mobile Handsets
- Professional Two-Way Radios
- Submarine Cable
- VSAT Equipment
- Wi-Fi Based Products
- WiMAX Equipment
- Wireless Data Products

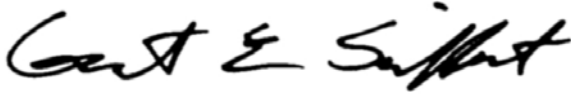
Given the number of standards related issues our sector is facing in China (e.g. WAPI and Information Security Assurance), TIA believes it is important that negotiations with China should include making the point that its Type Approval process should not be used as a back door means to promote and implement its broader indigenous innovation policies. While China strives to encourage its domestic innovation, the mandating of regulations with the purpose of promoting domestic standards developed outside of international standard setting processes will only serve to isolate China from global innovation and exacerbate the weakening of investment during this global economic downturn.

TIA represents providers of communications and information technology products and services for the global marketplace through its core competencies in standards development, domestic and international advocacy, as well as market development and trade promotion programs. The Association facilitates the convergence of new communications networks while working for a competitive and innovative market

environment. TIA strives to further members' business opportunities, economic growth and the betterment of humanity through improved communication.

TIA and its members stand ready to assist the U.S. government with its negotiations with the People's Republic of China as requested and appropriate.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant E. Seiffert". The signature is fluid and cursive, with the first name "Grant" being the most prominent.

Grant Seiffert

President

TIA Member Companies explicitly supporting an MRA with China:

Apple, Inc

Cisco Systems, Inc

Hughes Network Systems, LLC

Intertek Testing Services

Motorola

Underwriters' Laboratories