

## Declaration of Non-Applicable Japanese Laws for TELTONIKA NETWORKS Ethernet Switches

6<sup>th</sup> of October, 2023

Kaunas

### 1. Radio Law (Law No. 131 of May 2, 1950)

TELTONIKA NETWORKS UAB hereby declares under our sole responsibility that the Unmanaged Layer 2 Ethernet Switches described in Annex I don't use any wireless technology so these devices are not classified as Radio Equipment and certification under the Japanese "Radio Law". A more detailed explanation of this law is provided below:

*Radio Equipment (RE) should meet the requirements of the Japanese "Radio Law" and the "Ordinance Concerning Technical Regulations Conformity Certification of Specified Radio Equipment". The Radio Law's scope covers all products that emit electromagnetic waves with frequencies under 3 THz. Article 38-2-2 of the Radio Law defines different types of Specified Radio Equipment (SRE) and Special Specified Radio Equipment (SSRE). These categories include equipment that utilizes wireless technologies such as Bluetooth, Wi-Fi, LTE, WCDMA, GSM, ZigBee, and so on.*

### 2. Telecommunications Business Law (Law No. 86 of December 25, 1984)

TELTONIKA NETWORKS UAB hereby declares under our sole responsibility that the Unmanaged Layer 2 Ethernet Switches described in Annex I are designed only to connect to local LANs, or to the public telecommunications lines facilities (e.g., public network) of telecommunications carriers (e.g., mobile communications carriers, or internet providers) through approved equipment, e.g., router, gateway or modem. Devices connected through approved equipment and not directly connected to telecommunications line facilities are beyond the Japanese "Telecommunications Business Law" scope and because of that certification according to this law is not needed. A more detailed explanation of this law is provided below:

*Telecommunication Terminal Equipment (TTE) should meet the requirements of the Japanese "Telecommunications Business Law" and "Ordinance Concerning Technical Conditions Compliance Approval and Certification of the Type for Terminal Equipment". Article 4 of the "Ordinance Concerning Technical Conditions Compliance Approval and Certification of*

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*the Type for Terminal Equipment” defines two TTE classes: (1) Terminal Equipment for the purpose of phone calls (e.g., mobile phones) and (2) Other Terminal Equipment (e.g., modems, IP terminals). In order to prevent damages to the telecommunications circuit facility, the TTE connected to the public telecommunications circuit facility needs to comply with technical conditions provided in the “**Ordinance Concerning Terminal Facilities, etc.**”. Devices that require approval etc. pertaining to the Terminal Equipment requirements shall fall under all of the following conditions, (1) to (3), as defined in Article 34-10 of “**Ordinance Concerning Terminal Facilities, etc.**” but those specified in (4)<sup>1</sup> do not fall under these conditions:*

- (1) Terminals, including dedicated communications line facilities (limited to those connected to digital data transmission facilities).*
- (2) They use internet protocols (IP) to connect to digital data transmission facilities.*
- (3) They can change (control) settings for the telecommunications functions (limited to those related to transmission and reception) of the terminals, including dedicated communications line facilities, by connecting to telecommunications line facilities.*
- (4) Terminals, including dedicated communications line facilities, that allow users to change the functions specified in any of the conditions specified in the following conditions with ease by arbitrary software as needed*

*Devices connected through approved equipment and not directly connected to telecommunications line facilities are beyond the scope of the approval.*

### **3. Electrical Appliance and Material Safety Law (Law No. 234 of 1961)**

TELTONIKA NETWORKS UAB hereby declares under our sole responsibility that the Unmanaged Layer 2 Ethernet Switches described in Annex I don’t fall under the “**Electrical Appliance and Material Safety Law**” specified devices categories and because of that certification according to this law is not needed. A more detailed explanation of this law is provided below:

*The Japanese Safety Law (“**Electrical Appliance and Material Safety Law**”) is applicable for 457 Electrical Appliances and Materials that are subject to its regulation and divides them into two categories, (1) “Specified Electrical Appliances and Materials” and (2) “Non-Specified Electrical Appliances and Materials” reflecting the degree of risk of the products.*

*Radio Equipment and Telecommunication Terminal Equipment are not classified as “Specified Electrical Appliances and Materials” (116 items) and “Non-Specified Electrical Appliances and Materials” (341 items). The conclusion is that RE and TTE are not under the scope*

<sup>1</sup> For example, routers correspond to those specified in (4), but devices that do not use IPs or devices that can be connected only to dedicated lines are excluded.

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*of the Japanese Safety Law. Since the mentioned equipment categories are out of the scope of the Japanese Safety Law, reporting to the Ministry of Economy, Trade and Industry (METI) is not needed and marking is not allowed.*

#### 4. General Statement

TELTONIKA NETWORKS UAB hereby confirms under cur sole responsibility that since Japanese “**Radio Law**” and “**Telecommunications Business Law**” are not applicable to the Unmanaged Layer 2 Ethernet Switches described in Annex I testing and marking by the Technical Conformity Mark (GITEKI mark) is not required.

In addition, testing and device marking by the PSE mark is also not required because the “**Electrical Appliance and Material Safety Law**” does not apply to the devices mentioned in Annex 1.

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**Annex 1.** List of TELTONIKA NETWORKS UAB manufactured Ethernet Switches

Category	Device
Unmanaged Layer 2 Ethernet Switch	TSW010
	TSW100
	TSW101
	TSW110
	TSW114
	TSW200
	TSW210
	TSW304



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