



Mr. Günter Verheugen
Vice President
Commissioner for Enterprise & Industry
European Commission
B-1049
Brussels

Mr. Dan Price
Assistant to the President for International
Economic Affairs
The White House
Washington D.C.

25 April 2008

Dear Vice-President Verheugen, Dear Mr. Price,

We write to you in your capacity as Co-Chairmen of the Transatlantic Economic Council (TEC) to highlight the importance for EU industry of an issue on the TEC agenda for its next meeting on May 13 - the question of US authorities permitting suppliers of electric and electronic equipment to self-declare their products' conformity with US safety standards.

A suppliers' declaration of conformity (SDoC) approach is vastly preferable to the existing US approach of mandatory third party testing and certification of products for a number reasons. Firstly, SDoC would lead to considerable cost efficiency savings for companies in the sector. Under the current US system the cost of testing and certification is a \$5,000 initial fee per product plus an annual recertification fee of \$5,000. Considered across the size of the market these figures are significant: Europe exported some \$11,700 million worth of electrical and electronic equipment to the US in 2007 and the value-added of European affiliates operating in the US in this sector in 2005 was worth a further \$13,200 million.

Secondly, in addition to viewing this issue in the transatlantic context we urge you to consider also the global regulatory environment for electrical and electronic equipment. If we are to hope to achieve the industry goal of 'one standard, one test, accepted

everywhere' we must convince today's emerging economies to put in place systems of conformity assessment that use the most efficient measures to achieve the desired objectives. The US Nationally Recognized Testing Laboratories (NRTLs) program creates unnecessary obstacles to international trade and makes it difficult to make the case with other countries.

Finally, all of this is achievable with no reduction to the level of safety protection. Under SDoC, manufacturers remain responsible before the law for the safety of the products they put on the market and so have the same incentives to accurately test and certify their products. This is borne out by the excellent safety record of the electrical and electronic equipment sector in the European Union since the introduction of suppliers' declaration in 1973.

For these reasons we call on the TEC to agree that the US will move to an SDoC approach to conformity assessment. A success of such a concrete nature would represent a considerable boost to the industry concerned and to the TEC's own standing in the future.

Naturally, the TEC must also move to address issues within Europe of concern to the US side. In this light BUSINESSEUROPE has highlighted a broad range of priorities in its joint letter of March 7 with the US Chamber of Commerce.

We are confident that you will take this request into account.

Yours sincerely,



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