

How to Operate Module Marks in  
Combination with Approval Marks  
Under R129  
(CRS-67-02e & CRS-67-12e)

16 Oct., 2017

JASIC

# Proposal at the 67<sup>th</sup> Meeting

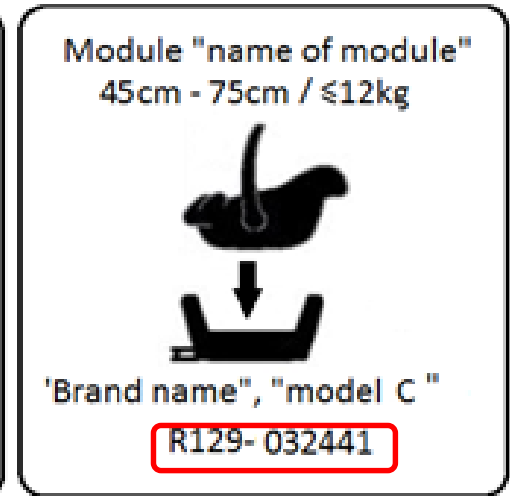
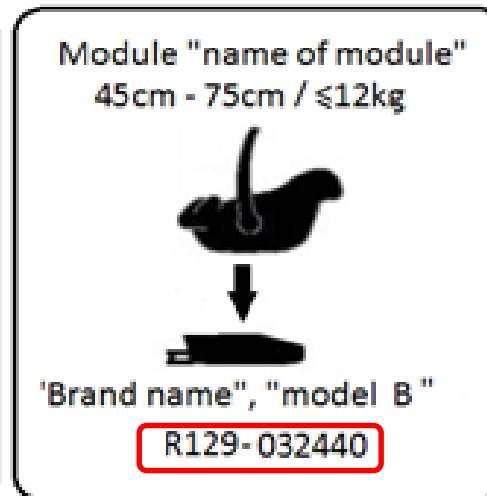
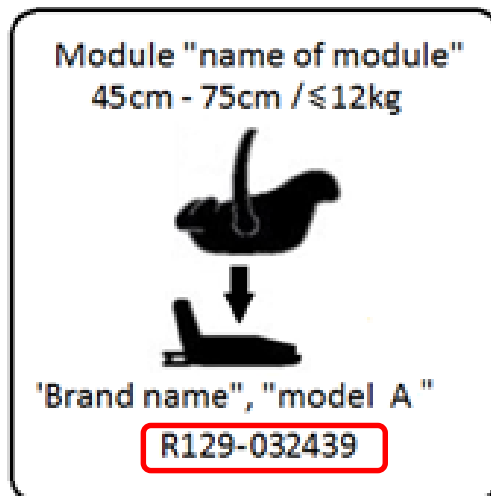
## Annex2. paragraph2.1.1.

Where a module is approved for use with more than one base, the individual base and module combinations **shall be indicated on the module in separate module marks**, each bearing their applicable size ranges.

a/3 I  
a/3 I

a = 8 mm minimal

a/3 I  
a/3 I



# What Is Indicated on Each Product?

1) When all products are sold (produced) at the same time

Products	Mark		
Module	Module mark: R129-0324 <b>39</b>	Module mark: R129-0324 <b>40</b>	Module mark: R129-0324 <b>41</b>
Base A	Approval mark: R129-0324 <b>39</b>		
Base B		Approval mark: R129-0324 <b>40</b>	
Base C			Approval mark: R129-0324 <b>41</b>

Three marks are indicated on the module, showing that it is possible to use it in combination with all of Bases A, B, and C.

# What Is Indicated on Each Product?

2) When Bases B and C are sold **later**

Products	Mark		
Module	Module mark: R129-0324 <b>39</b>	Module mark: R129-032440	Module mark: R129-032441
Base A	Approval mark: R129-0324 <b>39</b>		
Base B		Approval mark: R129-0324 <b>40</b>	
Base C			Approval mark: R129-0324 <b>41</b>

The module, when on the market, has no indication of R129-032440/41; therefore, it is impossible to know if it can be used in combination of these bases even though technically there is no problem with such use.

# What Is Indicated on Each Product?

3) This problem can also occur the other way around.

Products	Mark		
Module A	Module mark: R129-0324 <b>39</b>		
Module B		Module mark: R129-0324 <b>40</b>	
Module C			Module mark: R129-0324 <b>41</b>
Base	Approval mark: R129-0324 <b>39</b>	Approval mark: R129-032440	Approval mark: R129-032441

The base, when on the market, has no indication regarding Modules B and C, which are sold later.

# Rules on Actual Operation

How should we address this issue?

- a) Should we prohibit the use as long as there is any inconsistency in the approval marking?
- b) Should we allow the use if there is no technical problem, on the condition that the manufacturer informs the public of such use?
- c) Should we allow the use on the condition that the model names of compatible modules (or bases) are indicated on the base (or module) to be sold later?
- d) Others?