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# Regulatory Update

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## Brazil: ANATEL considering IPv6 certification

Dear customer,

ANATEL are currently considering the possibility of introducing IPv6 compliance requirements in Brazil.

PCS understand their motivations to be the fact that the IPv4 address range is scheduled to expire in Brazil in 2014, a desire to ensure a smooth transition to IPv6 and to protect transparency otherwise obscured by NAT and encapsulation.

Note: We understand ANATEL has expressed an interest not to enforce mandatory support of IPv6: for example it is expected that IPv4 devices without native IPv6 support will be acceptable.

ANATEL are currently in the process of talks with multiple local bodies – including ABINEE (Brazilian Electrical and Electronics Industry Association) and Brazilian regulatory vendors (e.g. local test laboratories and OCDs) – in an attempt to assess the current (and future) IPv6 landscape, seeking a methodology for introducing test and/or non-test<sup>(1)</sup> evaluation criteria of IPv6 devices.

The most progress has been made with **fixed network** terminal equipment devices (i.e. those which interface customer premises to the wider Internet space using RJ45/Ethernet or other non-wireless interface types):

The RFCs that are being used by ANATEL are currently RFC 6333 (Dual-Stack Lite Broadband Deployments Following IPv4 Exhaustion), RFC

6334 (Dynamic Host Configuration Protocol for IPv6 [DHCPv6] Option for Dual-Stack Lite) and RFC 6434 (IPv6 Node Requirements). These documents present a series of possible requirements for IPv6 devices, with a focus on CPE (Customer Premises Equipment) and devices that permit routing of IPv6.

The majority of these devices fall into ANATEL's category structure as a Category I device. Cellphone and Smartphones also fit into Category I however it is less likely any Anatel IPv6 requirements will affect these products initially.

PCS opinion is that fixed network terminal equipment devices are currently the prime candidate for any IPv6 certification (i.e. the inclusion of compliance data within the OCD Approval certificate) and/or mandatory testing, and this is supported by the opinion of the OCDs and local labs which have been privy to the ANATEL consultation process.

It appears that consideration of requirements for **mobile/cellular and non-cellular wireless devices** is less advanced, owing to the practical difficulties that arise in trying to assess the behaviour of mobile/cellular and/or non-cellular wireless devices capable of supporting IPv6.

We're told a recent meeting between ANATEL and local entities resulted in more questions arising, than solutions with respect to product assessment and testing procedures.

In summary, it seems very few people involved can identify a sensible approach to evaluating IPv6 compliance with mobile devices – perhaps owing to the relatively immature landscape of IPv6 regulation and its implementation worldwide. We know for example that ANATEL looks to the FCC regulations for much of its decision making, and in the absence of an FCC decision, so there seems to be no “quick fix” for deciding on what to test/assess for IPv6.

Meanwhile we recommend industry continue to lobby Anatel against introducing onerous requirements on IPv6 for mobile and client devices. As with the introduction of the Internet, industry has a keen incentive to ensure interoperability. Any regulation deemed necessary for IPv6 should be limited to router/gateway devices.



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(<sup>1</sup>) PCS understand that mobile devices may benefit from only a software verification process regarding IPv6, rather than actual testing – however this is NOT confirmed by ANATEL at this time, and testing of some kind may become mandatory for mobile devices

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