

Cyber Resilience Act



- Welcome to an horizontal regulation for internet connected equipment
 - wired and wireless
- Welcome to a regulation based on NLF
 - Successful and proven process for the EU market

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- Alignment of CRA requirements with Radio Equipment Directive delegated act for 3.3 (d), (e),(f) is needed
 - only one regulation for connected products

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- CRA scope to improve
 - Draft CRA refers to « *direct or indirect logical connection or physical connection to a device or network* »
 - This is including almost all electronic products on earth...not only internet connected
- Issue with « microcontrollers » as product category class I
 - All connected products do have at least a microcontroller... What is then the default product category?
 - A better definition of products categories shall be EC priority

- There is no need to consider « software » as a product in NLF.
 - Difficulty for Notified Bodies to emit an opinion
 - on an App for mobile phones
 - on a cloud based solutions
 - At each updates, 3 or 4 times a year?