Radio equipment and market access per delivery

Fictional case data and worked reasoning

A manufacturer will be placing twelve connected radio gateways on the EU market for the first time on 8 December 2027. In case of instruction, the devices will fall under the RED cyber requirements triggered by Delegated Regulation (EU) 2022/30. The delivery list, the previous legal reference and the related test report are documented. The lot will then be re-sold without significant change. Another eight gateways have been manufactured before but not yet placed on the market. Their first EU market purchase is planned for 12 December 2027. The manufacturer has the same earlier RED cyber file. The documented acquisition of the new batch to the correct CRA process is missing.

Test point	Purpose or comparison	Observation	Decision
Go before the deadline	12 units with first EU market access at 8.12.2027	Evidence for initial delivery and RED-cyber files available	Secure previous proof
Lot from the reference date	8 units with initial delivery on 12.12.2027	Previous reports, open CRA referral	Keeping market release open
Continuing tests	Radio requirements and CRA notification separately assessed	Own responsabilites provided	Keep separate supporting documents

Expected result

Comparable classification for unstocked, unbroken and separate reporting requirements.

Connect initial deployment with version and piece list.

Check the time-referenced RED and CRA requirements.

Determine the continuing radio requirements and notification separately.

Counter-test and next decision

Use the same production date for both lots in October. The documented data of the first placing on the market will not change. Continue to check the proof of market availability for the second lot in December.

Radio equipment and market access per delivery

For your observation, specify a findable document.

Capture the first placing on the market individually and justify the relevant file to radio system and CRA.

Verification identification, legal entity and date of processing and responsible body

Product version and delivery number

First documented or planned EU market access

Previous RED-Cyber reference

Applicable CRA requirements at the concrete level

Continuing radio requirements and reporting

Radio equipment and market access per delivery

Refer remedial and post-test to the original test order.

Findings and supporting evidence

Documents and remaining open assignments

Tested follow-up test with date, observation and version documentation

Dated release or follow-up

Release by and on the open order and date