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Ref.No.MAIT/PY/2403 November 25, 2021

Smt. Deepa Tyagi
Sr. DDG – TEC
Telecommunication Engineering Centre
Department of Telecommunications
New Delhi - 110001

Subject: Urgent request for extension of the implementation dates of MTCTE Phase – III and Phase – IV w.r.t Notification No. 5-2/2021-TC/TEC/93

Respected Madam,

Greetings from MAIT!

We would like to sincerely thank you for the meeting with the MAIT Delegation on 01st October 2021 and your assurance to look into the industry rationale for simplification of the Mandatory Testing and Certification of Telecom Equipment (MTCTE) Scheme to avoid business disruptions of the IT and Networking Industry.

As discussed in the meeting, readiness of the industry inherently dependent upon the readiness of TEC designated CABs and Test Labs for – EMI/EMC, Safety, Security, Technical and Other Requirements as per ER documents. The process of setting up a test lab and its designation as CAB will need at least 5-6 months more and is directly dependent upon TEC forethought which as of date are still under discussion. Though, there might be a good number of labs available to perform the Safety and EMI/EMC testing, but you would be well aware, there is a huge gap in terms of lab readiness for performing the Technical Parameter testing in India.

Anticipating the industry to get its products tested and certified by 01st July, 2022 is quite difficult to achieve as the TEC designated CABs for Essential Requirements (ER) are not yet in position to cater the magnitude of Phase–III and Phase–IV product categories. Industry has strong intent to support the regulation and comply with MTCTE requirements. However, as the deadline of 01st July 2022 is very close, and as an industry body we have consistently highlighted the below mentioned challenges due to the aggressive timelines of the implementation of the scheme:

1. Test Lab Readiness (Labs for testing Technical Requirements of ER):
Currently, TEC has only 3 designated CABs to initiate the in-country testing which will need to support approx. 1500+ models against 15 Product Variants issued by TEC under MTCTE Phase-III and Phase–IV as represented in Annexure–B across the industry. Further, TEC will also need to assess the availability of testing slots and the capacity of Test Labs and TEC designated CABs which will escalate the testing timelines, cost to industry and its consumers.

2. TEC Readiness status:

• Revised MTCTE Procedure V2.0 released in May 2021 has many concerns where a MATCOF is needed to resolve these issues and finalise the MTCTE Procedure with industry consultation.

• Application on MTCTE Portal is facing following issues, due to which industry will face the issue to match the timelines as mentioned in the Notification No. 5-2/2021-TC/TEC/93, dated 22nd September'2021

- BOMs are not getting uploaded on portal while submitting the online applications.
- Grant access to the multiple User on same login or multiple logins for same company.

3. Industry Readiness:

Considering the current scarcities of Global Chip and Ship as well as wide range and high volume of products, Industry expects that it will take at least 18 months, before the entire existing product range gets tested and certified by TEC before the cut-off date. Getting this done before the cut-off date is critical as otherwise, it will have a big impact on sales of products in India. Furthermore, in order to fulfil February'2022 orders delivery, many product companies will need to stop taking their customer orders on immediate basis as the products which are built on order basis requires minimum 03 months for delivery once the order is placed. Hence, in any case many companies will not be able to certify their products by February'2022 which will bound them to stop taking order in Nobember'2021 creating disruption in the business.

MTCTE Phase – III and Phase – IV can be a success only after the following Industry requests are looked into:

(a) A MATCOF for procedures need to be called to deliberate the Revised MTCTE Procedures V2.0 in consultation with the industry stakeholders
(b) Sufficient Lab infrastructure needed for the testing of Technical Requirement (TR) and Other Requirements (OR) as per the issued ERs by TEC till date.
(c) Smooth working of online application submissions on MTCTE portal – industry suggestion needs to be incorporated.
(d) Release of HSE criteria
(e) Blanket exemption for the whole unit warranty replacement units, which has reached End of the manufacturing life before the implementation date of the MTCTE regulation

The state of industry readiness is shared in a graphical representation as **Annexure-A** and **Annexure-B** for your kind perusal.

It is evident that currently NONE of the stakeholders are ready to take the testing and certification load for approx. 1500 + models against 15 Product Variants coming under MTCTE notification.

Industry intends to comply with the regulations and support the Indian Government in its initiative, however they are distressed that without the essential framework set in place, the whole scheme will not achieve its intended objective and will disperse the running economy of the country.

Since, time will be required to create and strengthen the essential framework for MTCTE scheme to run smoothly, MAIT requests TEC and DoT to establish a strong testing and certification ecosystem. Also give sufficient time to the industry considering the current Global Chip and Ship concerns to get their products tested and certified before the cut-off date.

➢ In the interest of all the stakeholders and for successful implementation of the scheme, we strongly feel that the in-country testing under MTCTE regulation should be pushed forward minimum by 18 months.

➢ Understanding the Government's intent to ensure use of compatible and safe products in the country, DoT may consider certifying telecom products based on globally accepted and existing test reports for EMI/EMC, Safety and Radio Frequency test reports only till the time test lab infrastructure is fully developed in India (for at least another 18 months).

We humbly request you to kindly consider our request of increasing the timeline and we assure you of our full cooperation in implementation of the regulation. We would be grateful if you could also give us **an appointment on a day & time convenient to you** to enable us to discuss the same in detail.

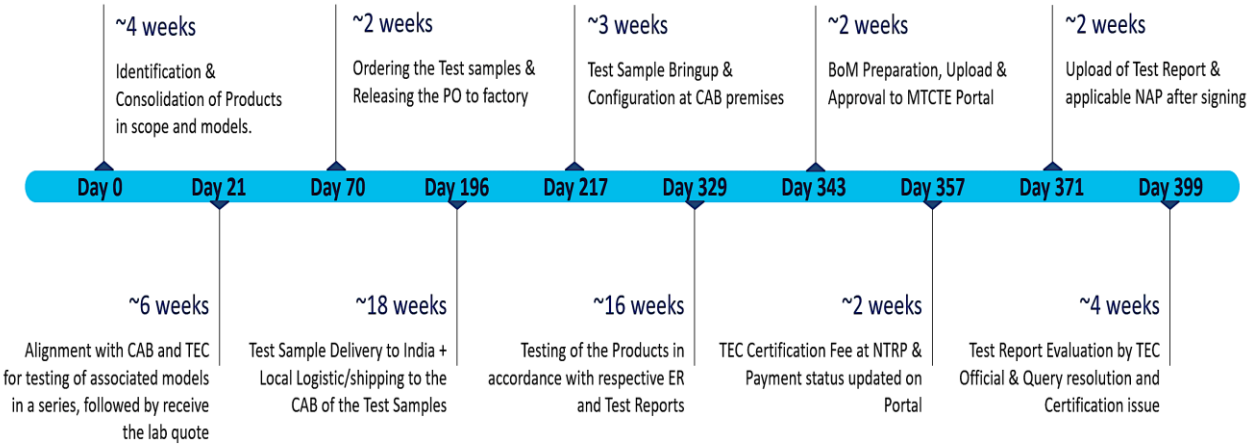
With regards,

George Paul
Chief Executive Officer

ANNEXURE- A. (Timelines Required)

S.No.	Process Flow for Getting a Product Tested & Certified	Timeline starting when ER, Procedure and Online Portal is supportive								
		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9
	Financial Quarters starting…	Jan-22	Apr-22	Jul-22	Oct-22	Jan-23	Apr-23	Jul-23	Oct-23	Jan-24
1	TEC Readiness (ER, Procedures & Online portal)	By Jan'22								
2	TEC CAB designated Lab Functional Readiness	03 to 06 months								
3	Industry Readiness	09 to 12 months								
4	MTCTE Certification based on ISO 17025 accrediated Lab Test Reports for EMI/EMC, RF, Safety, Technical & Security Requirement- **Phase - III**			Jan'2022 onwards for 18 months till Jul'2023						
5	MTCTE Certification based on ISO 17025 accrediated Lab Test Reports for EMI/EMC, RF, Safety, Technical & Security Requirement- **Phase - IV**							Jul'2022 onwards (06 months later to Phase - III, due to sequencing)		

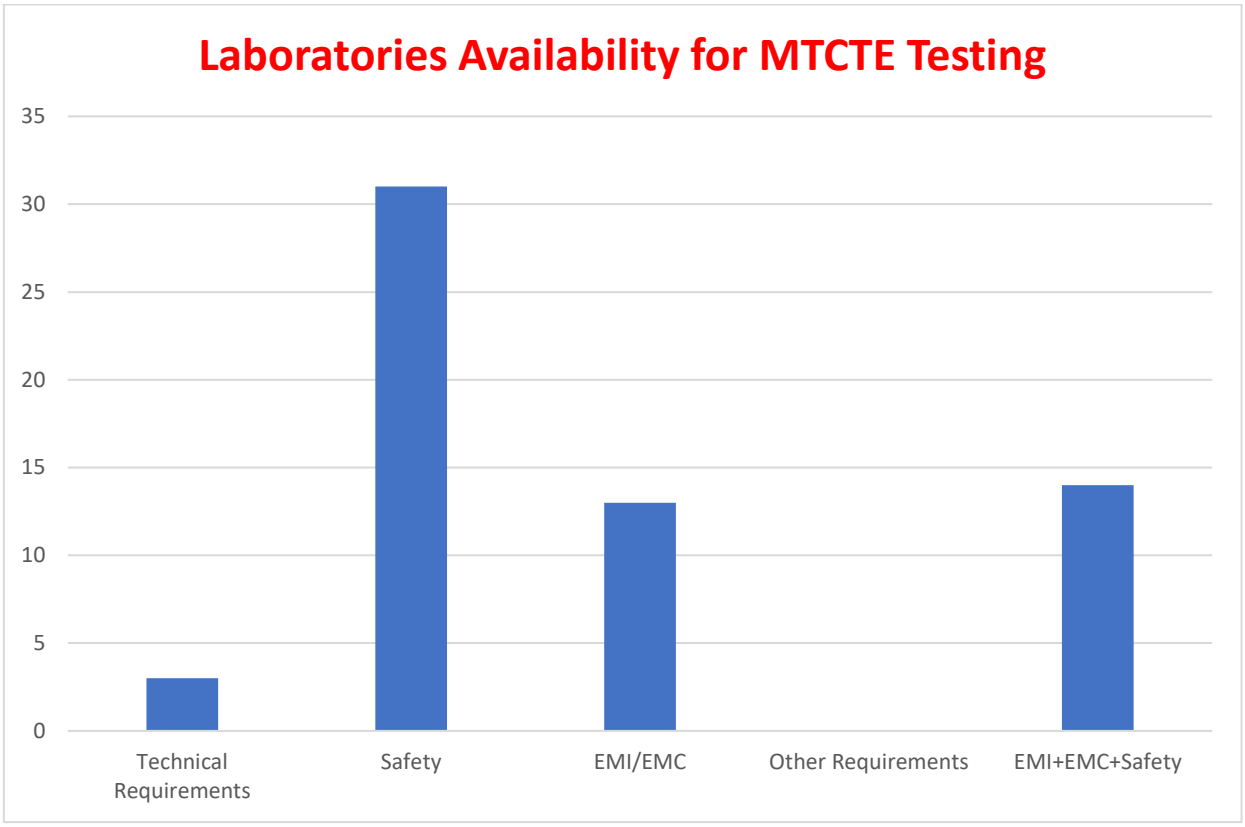
Timelines Required (Infographics): -



Note : Considering the current global chip and ship concerns, we believe these timelines will be pushed further.

ANNEXURE – B

In the MTCTE scheme under Phase-III & Phase-IV there are approximately 1500+ models available only for 15 Product Variants to test. However, due to less number of labs for Technical Requirement testing and no labs available with end-to-end testing capacity, causing manifold difficulties for stakeholder to proceed.



This additionally indicates that companies will have to take products to multiple laboratories to get all the test done, adding to the time required to obtain certification.