



PHD House, 4th Floor, Ramakrishna Dalmia Wing  
4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110016,  
Tel# 9599665859 E-mail: ceo@mait.com □ Website: http://www.mait.com

Ref.No.MAIT/PY/2563

October 17, 2022

Shri Pramod Kumar Tiwari, IAS  
Director General  
Bureau of Indian Standards

**Subject: Request to extend the implementation date from 17 December 2022 by at least another six months to 17 June 2023**

**Reference:** CMD III/16: IS 16333 (Part 3) dated 10.10.2022 issued by Central Marks Department III-Guidelines for implementation of Revised IS 16333 (Part 3): 2022

Respected Sir,

***Greetings from MAIT!***

BIS is carrying out path-breaking contributions in the testing and certification work under the MeitY notified "Electronics and Information Technology Goods (Requirement for Compulsory Registration) Order, 2012" and various amendments. The industry deeply acknowledges the pivotal role of BIS in making the existing Compulsory Registration Scheme efficient and streamlined. In turn, this contributes to the Ease of Doing Business in the country.

BIS had issued the Indian Standard for 'Mobile Phone Handsets Part 3 Indian Language Support for Mobile Phone Handsets – Specific Requirements (First Revision)' IS 16333 (Part 3): 2017 and applicants have been dutifully adhering to these guidelines while applying for BIS certification. BIS has now revised the standards and published it as IS 16333 (Part 3): 2022. The industry is fully appreciative of the updated standards and looks forward to complying with the same. However, the notification places an undue and unwarranted burden on applicants by giving them a **mere two months for compliance**. This leads to the following issues:

**Sample Sourcing, Testing and Certification:**

- The due date of compliance -17 Dec 2022 is too short a timeline for completing the entire process of certification-starting from securing the samples from overseas factories, importing and then testing in the labs and finally the application filing, scrutiny and approval.
- A brand may have multiple factories from where it might be sourcing samples. Arranging samples from each of these factories is a logistical challenge considering the short window given for compliance.
- The notification for changeover has been issued on 10.10.2022. However, the BIS portal is still not ready for the changeover of existing models or new models. Moreover, the required undertaking format is also not defined.

**Existing Inventory**

Further to the certification process to comply with the new standards, we would also like to draw your kind attention to the finished products/models already manufactured and stored in factories and warehouses in India and abroad. For these products/models, the in-box material (user guide, etc) mentions IS 16333 (part 3): 2017. This will be a logistical nightmare and have huge cost implications to update the in-box material to comply with the revised standard information.

BIS is making enormous contributions to the development of Indian standards in conformity with global and technological developments keeping the unique Indian requirements in perspective. The industry would again reaffirm our commitment to the revised standards. In light of the above-enumerated pain points and to ensure business continuity we would earnestly **request BIS to extend the implementation date from 17 December 2022 by at least another six months to 17 June 2023.** This will enable applicants to plan and prepare the necessary requirements to meet the revised standards.

Looking forward to an early affirmative consideration in this regard.

With regards,



Col. Ali Akhtar Jafri, Retd.  
Acting Director General - MAIT

CC: Shri Amitesh Kumar Sinha, IRAS, Joint Secretary, Ministry of Electronics & IT

CC: Smt Asha Nangia, Senior Director, Ministry of Electronics & IT