Ref.No.MAIT/PY/2248   May 30, 2023

Ms Chitra Gupta
Scientist-F & DDG (FMC, HM & Registration)
Bureau of Indian Standards

Subject: Parallel testing of products covered under the Compulsory Registration Scheme (CRS)

Ref:

1. Registration/Guidelines RG: 01 dated 19 Dec 2022
2. MAIT letter Ref. No.MAIT/PY/2673 dated 29 Mar 2023
3. MAIT letter Ref. No.MAIT/PY/2511 02 Aug 2022

Respected Madam,

Greetings from MAIT!

We would like to thank you for giving us the time to meet along with other BIS officials to discuss the parallel testing of ICT products covered under CRO. We once again thank BIS to listen and act on addressing one of the industry pain points by starting the Parallel testing for Mobile phones as a pilot project.

Based on our discussion, please find our submission for your kind consideration.

- In order to access the true impact of parallel testing, we request BIS to extend the pilot project by at least by another 6 -12 months from 01st July,2023 onwards. Based on the last 5 months applications data, BIS might not have seen the desired results as the pilot was allowed for only 6 months. OEMs normally plan product/model testing more than a year in advance and already would have planned sequential testing.
  - One-year clear window may be given to OEMs to plan their samples, align their project plans to take benefit out of this notification.

- BIS would have observed from current available data arising out of the pilot that OEMs would have saved minimum of 4-6_weeks' time in the testing and certain process leading credence to the industry request for allowing parallel testing.

- In order to arrive at a better impact analysis, we request BIS to allow parallel testing on all applicable products like Wireless Earphone /Laptop/Notebook/Tablet etc. under the pilot scheme. Testing of these products is taking the most time as previously highlighted to BIS through our letter no MAIT/PY/2511. Wireless earphone also comes under two product categories- Power Bank for portable applications and Wireless Earphone and Headphone. Laptop/Notebook/Tablet have four different product categories- Cell, Battery, Power adaptor and Laptop/Notebook/Tablet due to which parallel testing consumes significant time in registering final product.. Considering all products under parallel testing would give substantial relief to the industry.

- As you are aware that parallel testing is optional and the prevailing sequential testing is available and in either case, OEMs have to follow all relevant safety standards to get BIS certification.

- MAIT would also urge BIS to conduct an awareness for associations and OEMs in the form of a webinar to disseminate the provision of availing the parallel testing option after issuing suitable notification to extend and enlarge the scope of parallel testing. MAIT would be happy to lend support in this webinar.

We would urge BIS to kindly consider extending **the pilot project by at least another 6 -12 months and also add all applicable product categories under the pilot scheme.**

We look forward to your support on this matter.

Warm regards,

Col. AA Jafri, Retd.
Director General

CC: Shri Pramod Kumar Tiwari, IAS, Director General, Bureau of Indian Standards
CC: Shri S K Dutta, Scientist-E, Registration, Bureau of Indian Standards