Ref. No.MAIT/PY/2528   September 05, 2022

Shri R R Mittar
Sr. DDG
Telecommunication Engineering Centre

Sub: Labelling Guidelines and Requirements

Respected Sir,

Greetings from MAIT!

MAIT appreciates TEC's modification to the labelling requirements laid down in the MTCTE procedure of May 2021 through the TEC Office Memorandum dated September 7, 2021. Industry welcomes the revised labelling requirements. However, there are still a few concerns that industry has w.r.t the label requirements design. To facilitate placing the regulatory label on products that are ever decreasing in size, industry believes the label should be further simplified.

We request you to kindly consider the below feedback and make necessary amendments to the labelling guidelines:

The current TEC labelling requirement mandates the certified product to have the country name "INDIA", "TEC Certificate number", "TEC logo" and the TEC website address (https://www.mtcte.tec.gov.in)" on the product. Further, the MTCTE procedure No. 93009:2021 (released in May 2021) specifies that the height of TEC logo shall be 1 / 4th of the size of the brand name, subject to a minimum height of 6 mm. In case sufficient space on the product is not available for putting the regulatory mark, then the Country name ('India') and TEC logo is to be marked and rest of the information can be in QR code on the product.

- We would like to bring to your kind attention that in some products, the size of the brand name is just 6 mm or even lesser than that. In such products, industry finds it difficult to follow the TEC's labelling requirement of maintaining the minimum size of 6 mm for the TEC logo.

- Also, industry is having difficulties with putting all the texts i.e., "INDIA, TEC Certificate number and the website address", along with the TEC logo on the regulatory label due to space constraint in the regulatory label. As we are aware, MTCTE is India specific regulatory requirement and including a country name (i.e., India) on the regulatory label provides no additional useful information. If we refer to any regulatory mark on the product, the mention of country name is not mandated anywhere in the world.

- Industry requests clarification from TEC on whether the TEC certification number would remain constant or would it change at the time of ER revision/certificate renewal. If the certificate number changes, this could lead to a constant relabelling exercise and, in that case, we ask that TEC either not mandate the certificate number or do not change the certificate numbers at the time of renewal.

- In addition, websites can change, leading to a non-useful web reference or another label update exercise. The best practice for labeling around the world is to limit the labeling requirement to a single mark without extra text. All additional information (i.e. the country name, website address of TEC, etc.) can be provided on the product technical manual for reference by the consumers.

- Further, industry understands that for products of smaller size can have "India" and TEC logo on the product regulatory label and rest of the information, i.e., the Certificate number and TEC website address can be in a machine-readable two-dimensional code format (QR code etc.). We hope TEC would appreciate that putting TEC logo along with the QR code will require more space than putting the TEC standards labelling format itself. We request TEC to not mandate both "TEC logo + India text" and "QR code". Instead limit the labelling requirement to just the QR code or just the TEC logo (without any other text). We also request TEC to not limit the QR code provision for products with smaller size. The OEMs should be given the freedom to choose between the QR code format vs the TEC standard mark requirement.

Industry Requests: TEC should consider to further simplify the labelling by:

- **Reduction in the size of TEC logo.** We request you to kindly allow the height of the TEC logo to be 1 / 4th of the size of the brand name/logo, **and do not subject it to a minimum height of 6 mm.**
- **Mandate just the TEC logo on the certified product.** The rest of the information (i.e. the text "India", TEC certificate number and TEC website address") will be on the product technical manual.
- **Shorten the TEC website address**: At present the TEC website address i.e. "https://www.mtcte.tec.gov.in" is too long. It is important to create a smaller and simpler URL address, considering the ease of customer accessibility.
- **TEC certificate number to remain constant:** Remove the reference of certificate number form the logo. If TEC feels the reference of certificate number cannot be deleted, then we request the certificate number to remain constant and does not change at the time of renewal/ER revisions.
- **Not mandating "TEC logo + India text" and "QR code" on products.** Instead, TEC should consider limiting the labelling requirement to either just the QR code or just the TEC logo (without any other text).
- **Not limiting the QR code provision for products with smaller size.** The OEMs should be given the freedom to choose between the QR code format vs the TEC standard mark requirement.

As assured in principle by TEC, we are sanguine that the above detailed information with comprehensive recommendations would be accepted in toto for the benefit of Ease of doing business in the country.

With regards,

Col. AA Jafri, Retd.
Dy. COO
(Acting Director General – MAIT)

CC: Dr Mahesh Shukla, Member-Services, Department of Telecommunications