Ref.No.MAIT/PY/2391   October 06, 2021

Smt. Deepa Tyagi
Sr. DDG – TEC
Telecommunication Engineering Centre
Department of Telecommunications

Subject: <u>Request to ease MTCTE regulations w.r.t the new notification on launch of Phase–III and Phase–IV apart from Revised MTCTE Guidelines</u>

Respected Madam,

Greetings from MAIT!

This representation bears reference to our meeting with the Senior Officials of TEC on 31st August 2021, where MAIT had explained in particular industry difficulties related to the MTCTE revised procedure and implementation timelines for Phase–III and Phase–IV.

We are writing this to draw your attention to Notification No.5-2/2021-TC/TEC/93 dated 22nd September 2021 w.r.t announcement of implementation dates for products under MTCTE Phase – III and Phase – IV as published by TEC without consultation with the industry stakeholders. Earlier also, TEC published the Revised MTCTE procedure version 2.1 dated May 2021 without any deliberations with the industry on the above subject.

May we request TEC and DoT to put in place a process of holding back the implementation of the latest notifications till the time stakeholder deliberations happen with the industry members and their feedbacks incorporated into the notification/addendum. The objective is the implementation of the MTCTE notification on Phase–III and Phase-IV with full Industry Participation.

Further, we highly appreciate TEC for providing approx. 8.5 months to the industry to get their products tested and certified. However, we request TEC to extend the implementation timelines of products in Phase-III and Phase-IV to May 2023 and July 2024, respectively. Also, considering the scope of test requirements and complexity of the Telecom Equipment, we request that TEC provide a minimum of 18 months to perform in-country testing and certification under MTCTE.

MAIT strongly recommends the concept of a "one nation one regulation" scheme where all standardisation, testing and certification from multiple Ministries should be consolidated under a single umbrella rather than creating a nightmare for EoDB by involving Dual Ministries and various certifying bodies. There should be a one-time application/registration fee, one testing fee, one renewal fee, one recertification fee and one point of Governance for functional control. We recommend considering a single-window clearance for all product certification through one platform with a guaranteed TAT (Turn Around Time), with a single Regulatory Organisation similar to EU/FCC/OFCOM/ACMA or any other ICT regulator in the world.

At last, there should be no certification overlaps for the products within the same country. Currently, the products regulated under MTCTE (Phase–III and Phase–IV), CRO and WPC include - Routers, Smart Watches, Smart Cameras, CCTV, POS, and equipment operating under 2.4 GHz to 5 GHz etc. Until the product overlap issues get resolved within the Ministries, we humbly request TEC and DOT to put the category of overlapping products under abeyance.

The industry acknowledges that it is essential to ensure the products should not hinder the safety and security of end-users apart from complying with the relevant national and international regulatory standards and their requirements. Though, it is critical to ensure the kind of impact it will create on the existing businesses.

Hence, we again request TEC to consult the industry stakeholders before releasing any draft (new or revised) or notification related to the MTCTE scheme. Besides, to support TEC for the smooth implementation of the MTCTE scheme, we submit detailed industry feedback as **Annexure-A** on "Pending issues of Revised MTCTE Procedure" and **Annexure-B** on "Industry feedback w.r.t MTCTE Notification on Phase-III and Phase–IV".

We hope that you will understand the grave situation of the industry. Hence, we would humbly request you to consider our suggestions.

We would be grateful if you could **give us an appointment on a day and time convenient** to enable us to personally apprise you of the matter. We would greatly appreciate your kind confirmation.

With regards,

George Paul
Chief Executive Officer

Annexure-A [Pending issues of Revised MTCTE Procedure]

S.No.	MTCTE Clause	Industry Challenge	Recommendation
1.	**MTCTE Procedure 2021; Page 6, History Sheet**	Industry is concerned that these updates were pushed forward with no stakeholder consultation or feedback.	It is a general practice across all Indian Ministries and their departments to involve impacted stakeholders and seek their inputs while drafting the procedures and regulations that impact businesses. We encourage TEC to take into account stakeholder inputs and request TEC to consider making appropriate changes in the revised MTCTE procedure basis industry's feedback.
2.	**MTCTE Procedure 2021; Page 13, Section 2.0**, Item xxvii 'Telecommunication equipment' also referred to as 'Telecom Equipment' or 'Equipment' is synonymous with 'Telegraph', as defined in Section 3 of Indian Telegraph Act, 1885, and the terms are interchangeable for Telecom and **applicable ICT Equipment.** **Page 14, Section 4.1:** The scope of certification would cover all types of Telecom/**related ICT Equipment** to be sold in India for being connected or capable of being connected to Indian Telecom / Communication Network. The effective dates for certification becoming mandatory for different products are notified by the Government separately.	The revised MTCTE procedures add "applicable ICT equipment" and "related ICT equipment", respectively, to the definition and scope of "Telecommunication Equipment" under MTCTE. Industry believes that TEC is expanding the scope of MTCTE without presenting any rationale for doing so. ICT products are already governed by other Ministries under different regulations. Bringing ICT products under the ambit of the MTCTE telecom product definition, creates redundancies in policies, certifications and regulations, leading to a more complex and challenging set of requirements to bring products to Indian market.	The industry strongly advises TEC against such expansion of scope. We recommend that TEC limit the scope of the products under the MTCTE to only core telecom products which connect to telecom networks directly.

| 3. | Page 14, Section 4: Scope of Certification | **Section 4.6 Exemption for HSE**: While industry appreciates TEC's exemption for HSE, we are still waiting for TEC to issues the HSE criteria. Industry organizations have submitted draft HSE criteria for consideration to TEC multiple times in the past.

Exemption for End of Life (EOL) Whole Unit replacements: Though TEC exempts "Spare cards and faulty cards after repair from the MTCTE scope (as indicated in the text following Table A.2), but it does not acknowledge EOL whole unit replacements. To support the after sales of telecom products sold in the country, industry is required to support customers even when the manufacture of a telecom product has ceased. In these cases, testing and registering of legacy telecom products is not possible, as the test jigs/critical components, etc. cannot be made available by the manufacturer. Hence testing and registration of pre-manufactured EOL telecom products is practically impossible. In some cases, for warranty supports, whole units are also imported. | We request that TEC consider adopting the following criteria for HSE: *"A product may be classified as HSE and shall stand exempted from the MTCTE if it meets any of the following criteria provided, they are manufactured/imported in less than 100 units per model per year:*
• *Equipment powered by 3 phase power supply; OR*
• *Equipment powered by single phase power supply with current rating ≥ 16A in total; OR*
• *Equipment with weight >45 Kg; OR*
• *Equipment size 3U and above"*

Industry requests TEC to provide similar exemption for EOL Whole unit replacements as given for "Spare cards and faulty cards after repair. The whole unit EOL replacement units shipped to India would be clearly differentiated from the rest of the products by marking it as "Not for Sale/ Imported as warranty replacement". Manufacturers can also provide a list of such EOL whole unit replacements (with part numbers) to TEC for exemption based on self-declaration. |
| 4. | **Office Memorandum no. 5-10/2021-TC/TEC dated 07.09.2021 (Labelling Relaxation Guidelines)** | The revised MTCTE procedure mandates to include markings such as "India", Certificate Number, TEC Logo, and address of | Industry requests that TEC allow the height of the logo to 4 mm and text size up to 3mm for small products. We also |

		MTCTE Portal of TEC. These requirements lacks utility or usefulness to consumers.	recommend that TEC to introduce e-labelling for products with display and QR Code labelling for other products.
		Inclusion of Certificate Number is especially problematic because after the expiry of the Certificate Number it is will affecting the entire supply chain, when a certificate is renewed.	Industry requests the option for labelling on either the equipment or the packaging. This labelling provision is aligned with other Indian mandatory labelling requirements like that of the BIS standard mark for CRO products, as defined in the BIS Conformity Assessment Regulation 2018 (Pg 224), which allows BIS label to be either on the product or on the packaging.
		Annexure-D, Item 2.0 (i) requires the TEC certification label on body of the equipment.	
		Annexure-D, Item 3.2 specifies that minimum logo size. For products of a small size, it would be challenging to meet the 6mm height and 6point text size.	
		Annexure-D, Section 13.0 states: "13.0 Manufacturers may initiate advance action for labelling the equipment before issue of certificate by TEC, only after ascertaining at their own level that the equipment conforms to relevant ER, and the product would conform to relevant ER when tested in the designated CAB under MTCTE." If a manufacturer does not know the certificate number and validity period, how can they "initiate advance action for labelling the equipment before issue of certificate by TEC"?	TEC to clarify the position.
5	**MTCTE Procedure 2021;** **Page 11 Section 2.0, Item xvii:** "Provisional Certificates is defined as model of	Currently, there are currently only two labs that have the capability to test the Technical Requirements for products like Access points, Access Points Controllers, Routers, LAN switches, etc.	Industry recommends that the criterion for issuing provisional certificate should not be solely limited to "non-availability of complete testing infrastructure in

	telecom equipment has undergone specified testing but does not comply with some parts of relevant Essential Requirements <u>due to non-availability of complete testing infrastructure in the country</u>….	The inadequate lab infrastructure in India would delay the overall testing and certification time, delaying the product launches in India and ultimately disrupting the businesses.	the country." The members of ITI strongly recommends that TEC should carry out an evaluation study to access the number of models to be tested viz-a-viz number of labs available to perform the testing. TEC should mandate local testing only when at least 10% lab infrastructure is available to perform the testing of the number of models available in the market. This will ensure that testing capacity is assured and will minimize delays in product testing and products launches in India. If there are less than 10% labs available in India for any specific parameter of the ER, TEC should consider giving provisional certificates to the OEM.
6	**MTCTE Procedure 2021; Page-16; Section 5.6:** As a relaxation, test reports / results from any lab accredited by accreditation bodies under ILAC may be accepted except for those parameters of ERs which are listed on TEC website on MTCTE Portal TEC website (www.tec.gov.in) and MTCTE Portal (www.mtcte.tec.gov.in) to be mandatorily tested in Indian CABs. Such list of parameters will be notified from time to time on TEC and MTCTE Portal. These relaxations are time bound in nature. The test results / test reports submitted during this period shall not be older than five years on the date of submission	Industry appreciates TEC for giving brief relaxations by accepting ILAC test report for the Technical Parameters. However, the Technical parameters are not mandated anywhere in the world, hence the OEMs would not be able to leverage the relaxation and would not be able to submit ILAC test report for the Technical Requirements. This effectively means that a product needs to be tested for the entire suite of ERs in India.	Similar to the position taken by TEC for Phase 1 and Phase 2 products where they accepted ILAC test reports, we strongly recommend TEC to continue with the approach and accept ILAC test reports for EMI/EMC and Safety requirements for an initial one (1) year from the date of publication of the any future phase of MTCTE. After the 12-month period, industry can perform in-country testing for their non-certified products (including new models) and apply for TEC certificate based on the in-country test reports from CAB. This will help the labs in India gear up for the new product categories and support business continuity by avoiding supply chain disruptions.

7	**MTCTE Procedure 2021; Page-12 Section 2.0 Item xix "Temporary Certification"**	A non-availability of an ER should not lead to delay in the product launch. TEC position for one-year validity of the temporary certificate is problematic as it creates more testing and compliance burden.	This Temporary Certification should be dropped. If there are any products for which an ER is not developed, then TEC should release an order to regulate the products by a prospective date. Until the ER for such a product is not developed, the OEMs should be allowed to ship / manufacture their products in the Country.
8	**Page 16; Section 5.12** The certification procedures, which are detailed in this document, are subject to revision from time to time.		Since industry is the biggest stakeholder in the process, it is requested that industry be consulted early in these revision processes.
9	*Page 17 Section* 6.1.7 6.1.7: The certificate will normally be issued within 4-8 weeks from the date of submission of complete test results, depending upon complexity of equipment (for GCS products)		Industry requests that TEC add a provision of "deemed approval/ certification." Furthermore, the upper limit of 3-4 weeks for issuing certificates should be defined. The current timeline of 2 months is too long a period for every product. For provisional certificate, the timeline should be 2 weeks.
10	**MTCTE Procedure 2021; Page 21, Section 10.1.2**	TEC may call for re-testing/re-evaluation of certified telecom equipment. and charge the relevant fee, should the need arise to check on the compliance of the equipment to the ERs.	• A set of pre-defined criteria should be released by TEC which may require re-testing? • Will OEM need re-test whole product which was certified under a family certificate or can test few chassis in tested family if need arise for re-evaluation? Need detail clarity from TEC on this.
11	**MTCTE Procedure 2021; Page 21, Section 10.3**	In case of modifications affecting ER conformance (refer clause 10.2.1), certificate holders should apply online afresh, and the equipment shall have to undergo complete testing,	A pre-defined criterion should be released by TEC on how we define if modifications are affecting ER conformance or not?

		as applicable. The modified equipment shall be sold or used only after fresh certificate is issued by TEC.	
12	**MTCTE Procedure 2021;** **Page 21, Section 10.3**	In case of modifications affecting ER conformance (refer clause 10.2.1), certificate holders should apply online afresh, and the equipment shall have to undergo complete testing, as applicable. The modified equipment shall be sold or used only after fresh certificate is issued by TEC.	In case of addition of new Line Card/Interface Module which is built around same hardware/ PCB/ Motherboard of already certified similar Line Card/Interface Module in TEC MTCTE Certificate, then only incremental testing needs to be done. OEM self-declaration also need to be submitted for that hardware changes does not affects ER conformance.
13	**MTCTE Procedure 2021;** **Page 21, Section 10.3**	In case of modifications affecting ER conformance (refer clause 10.2.1), certificate holders should apply online afresh, and the equipment shall have to undergo complete testing, as applicable. The modified equipment shall be sold or used only after fresh certificate is issued by TEC.	In case of addition of new hardware which is affecting ER conformance evaluated based on criteria defined by TEC, in this case OEM need to test worst case config of the family with new hardware
14	**Guidelines for OEMs/Test labs/CABs regarding MTCTE Point # 6**	It is mandatory to upload photos of main model and its associated variants of the product so that all ports/interfaces and details like model, type etc. are visible.	It is not feasible to share actual photos of associated models as sometime associated models still under development when OEM apply for Main model certification. Even if product is available, we do not order/manufacture associated models as we need highest model for testing and certification. So, TEC should accept photos which are available in datasheet of main model, it will have all required information of associated models including port configuration, power consumption & etc.

15	MTCTE Procedure 2021; 7.2 (MTCTE Procedure ver 2.1)	We seek clarity on Phase 3 and Type of Categories TEC will be covering in it	We seek Industry stakeholder's consultation for the Notification of the said Implementation of Phase-III
16	MTCTE Procedure 2021; Annexure-D/ Clause 4.0 Page 48 of 51	The 'TEC certification e-label / physical label' consists of the Name of Country "INDIA", ER Number of the certificate issued for the device under MTCTE, the device's model number, Approval No (Certificate No) with date of issue certificate, validity of certificate, country of origin, Country of Manufacturing and TEC Logo, as given in following figure.	The clause requires lots of information for Labelling, but OEM will face difficulties in implementing it. If the (certificate No, issue date, validity period, etc.) is partially changed, it will affect the sales of inventory products, affect the manufacturing cost, and result in material waste. We suggest putting less information for labelling like Country, Model No., TEC Logo. Kindly confirm.
17	12 (MTCTE Procedure ver 2.1)		The labelling requirement must be confined with Label as per spec and ER Registration no of the product (All necessary details related to product can be retrieved by TEC based on ER no). But for OEM it becomes a challenging and be recurring process. Our factory, every five years they must change the ER no based on the latest ER issued.

Industry concerns & feedback w.r.t MTCTE Notification on Phase III & Phase IV, dated 22nd September 2021

I. **The notification No. 5-2/2021-TC/TEC/93 dated September 22, 2021 has been published by TEC with nil or negligible discussions with Industry.** (This is very distressing).

MAIT requests for the holding back the implementation of abovementioned notification till such time stakeholder discussion is held with industry and the industry feedbacks are incorporated into the notification.

II. MAIT has the following observations and suggestions to DOT. In the context of MTCTE, TEC has the MATCOF platform where the tests and the technical details are discussed in depth with manufacturers beginning from the stage of scope to draft to final specs to publishing of ER. A good process, run well by the highly qualified engineers from TEC.

However, DOT does not have a platform for discussing the Implementation side of MTCTE notifications with the industry. This cover aspects such as time lines, inclusion & exclusion of products in a family, labeling, older products already deployed, EOL, spare parts, the linkages to procedures at the import/export points, the certification overlap of the regulatory bodies, testing and certifying fee structures, etc.

The industry requires such a platform and MAIT requests for the creation of this platform with immediate effect, were the call to action needs to be included in deliberations on timelines and product lists. Till then, the latest notification on launch of Phase – III and Phase – IV implementation dates, dated 22nd September 2021 must not be considered.

III. **With regards to the implementation dates of Phase-III products**, we sincerely thank TEC for providing approx. 8.5 months to the industry to get their products tested and certified. We highly appreciate TEC for this. However, we would like to bring to your kind attention some of the real-world challenges that the industry has to go through while getting their products tested and certified. Before initiating the testing, the industry needs to raise sanctions, release POs to their manufacturing units, release POs to the testing labs, prepare the right configurations of the test samples, ship the samples to the test labs, train the labs to test the equipment, make the test jigs for the labs, and finally go through the testing procedures. Moreover, as under the MTCTE, the products are mandated to be tested for multiple test requirements (ranging from Safety, EMI/EMC, technical requirements which includes functional testing to radio conformance testing to IPV6 testing etc.) the testing time alone would require close to 4 months.

MAIT request to kindly provide at least of 12 to 18 months to the industry to get their products tested and certified. We would also request TEC to extend the implementation timeline of Phase-III products to May 2023.

IV. **With respect to implementation date of MTCTE Phase-IV,** the TEC order of September 22, 2021 specifies two implementation dates. The first is of February 1, 2022 wherein the products notified under the Phase-IV are required to be certified for Safety and EMI/EMC parameters, while the second implementation date of July 1, 2022 calls for the certification of Phase IV products for the remaining ER parameters.

This approach has the following serious drawbacks and MAIT also provided its recommendation below.

a) The implementation lead time provided for Phase-IV products is just 2.5 months for the Safety and EMI/EMC parameters. We would like to bring to your kind attention that when MeitY notifies a new phase under the Compulsory Registration Order (CRO), they provide industry a lead time of (6) months to one (1) year to test solely for Safety Requirements.

b) The lead time discussions have taken place multiple times with TEC, and we understand TEC also agreed that sufficient lead time will be given to the industry. But we fail to see our agreements in the final notification.

   MAIT Request: Considering the wide scope of test requirements under the MTCTE, the complexity of the Telecom Equipment, we respectfully request that TEC provide a minimum of 18 to 24 months for in-country testing and certification of the Phase-IV products. Also we would request that Phase – IV must commence after the completion of Phase – III as a tiered approach.

c) In Phase-IV, every product requires double the number of samples, the tests in the first bucket which has Safety & EMI/EMC tests has a implementation date which is before the tests listed in bucket two. Safety tests are destructive in nature, there by requiring for a second set of samples for doing the tests in the second bucket. This would unnecessarily double the sample costs and the certification costs for the OEMs/applicants. Also, it's a complete wastage of the test samples.

   In addition to the tiered approach, it is our recommendation that for the duration the in-country testing is completed and under certification, TEC should allow the import of the product based on test reports. This would help reduce the disruption to the business that the strict timelines provided under Phase 3 and 4.

   MAIT requests TEC to remove the bifurcations in the Phase-IV implementation dates. Instead, TEC should come out with a fresh single implementation date keeping in consideration the industry's request for a minimum 18 to 24 months for performing in-country testing and getting their products TEC certified.

d) TEC's regulations for consideration of ILAC reports for Technical parameters have been 5 years prior to the announcement of Phase 1. This was reinforced in the revised MTCTE procedure, announced in May 2021. However, the recent notification, dated September 2021 states that the consideration of ILAC reports for Technical parameters under Phase 3 and 4 is now for 2 years. In line with this regulation, several OEMs have undertaken international tests for their products in line with the requirements of MTCTE scheme. The recent change in timeline will impact the OEMs as they would have to undertake the tests again for all products under Phase 3 and 4. MAIT requests TEC to continue acceptance of ILAC reports for a period of 5 years till the domestic capability of CABs for conducting Technical parameters is sufficient.

e) The concept of provisional certification is resulting in increased burden in terms of certifications fees and effort for the industry. This is against the very essence of EoDB called out by the Hon P.M. Today the applicant pays 100% fee for a provisional certificate, then is charged from 50% to 100% of the fee for the final certificate.

   MAIT requests that the certification fee collected is one time, and no additional charge collected for all certificates issued on the product in the window of 5 years, be it provisional or final, issued in one stage or in multiple iterations.

V. During the discussions with TEC & DOT at the commencement of MTCTE scheme, industry was assured that the testing fee being charged, namely Administrative and Evaluation Fee which would cover all the 5 testing parameter namely - Safety, EMC, Technical, Other parameter and Security. The final MTCTE Procedure V1 also confirms the same

understanding. However, Industry is dismayed to state that today, industry is being asked to pay additional fee for security ER. The industry further stunned to see that the Phase – IV certification is bifurcated into 2 phases wherein the industry would be forced to pay twice the administrative and evaluation fee to get a TEC or MTCTE certificate.

MAIT requests that this additional fee of Rs 4.1 Lac (2.5L for security + 1.6L i.e 50% additional fee during certificate renewal, Group C product) not be charged. Similarly additional charges are 2.6L for group B and 2.3L for Group A products.

We were informed that it will not be TEC but a different body that will be testing and their fee is separate. Hence, we are perplexed and fails to understand why should the industry bear additional certification cost for the same product? This is completely against of the of Ease of Doing Business. MAIT requests DOT, TEC and NCCS to cap the maximum certification cost to the amount specified in the MTCTE procedure and scrap the certification cost as proposed (refer General Trivia for further details).

VI.   To draw your attention to another critical points Industry is receipt of a communication that the currently laid out norms for identifying a HSE are invalid. Here again we wish to draw to your attention that at the time of implementation of Ph I, we were assured by the formal Shri Shakeel Ahmad, Former Deputy Director General, Telecom Engineering Centre that HSE defined by the below categories will not come under the ambit of MTCTE as of now namely-

   A product is classified as HSE if it falls into any of the following criteria
      - Requires 3 phase power supply
              OR
      - Equipment operating in Single Phase with current rating > 16 Amp
              OR
      - Weight >45kg

MAIT requests that, the definition of equipment that fall under HSE be retained as is above till such time the new norms are published. To give a lead time of 18 months for certification of equipment that will in future get included under the MTCTE framework, and existing installations be exempt from requiring certification including on the spares, replacement and upgrades ordered on the same.

VII.   Duplication of standardization and certifying bodies. This is a nightmare of EoDB raising its head and immediate clarity is to be brought in to ensure that for a product there is only a single authority for defining standards and certifications.

MAIT does not see rationale in having two ministries defining standards, test procedures and having dual certifying bodies.

Today in a connected digital world, every equipment is connected to another or has the potential to connect to another. And through that characteristic of products, they have the ability to access the core telecom network or uses the core telecom network in their communication path.

This cannot be interpreted into every electronic equipment with the ability to connect and communicate will require certification by DOT if it is to be sold into the Indian market.

MAIT highlights below the problems arising out of Dual ministries and bodies being involved in standardization, testing and certifications and the nightmare of EoDB in the process

1) Marking and Labelling Requirements – Dual agencies demanding one Label each on the product. MAIT demands that there should be only one QR based label, beyond just Model number, Sr Number and Manufacturing Date on a label. We also propose for one INDIA QR Labelling for all BIS, TEC, WPC or any other upcoming Certification requirements. However, there should be one or central repository system which will hold all these certifications related information for future reference purpose.

2) Industry has a situation where the tests which belong to a group but some tests are governed by one agency and for the others to a second agency. This is resulting in double the costs, longer lead times etc. for which some examples are :
   a. Tests related to Wi-fi Radio Conformance (ETSI EN 300 328 and ETSI EN 301 893 standards) from an ILAC lab is accepted by WPC while issuing the ETA certificate. However, TEC insists for the same tests to be performed in India at an Indian CAB to get a MTCTE certificate.
   b. Tests related to Safety standards (IS 13252/ IEC 60950) is done in India and BIS is already issuing certificates for certain products under the CRO. However, TEC also insists on getting the products certified for the same safety IS/IEC standards under MTCTE scheme.

3) Surveillance – Dual agencies doing market surveillance. Increasing cost, regulatory compliance overheads, answering queries to two agencies, any one agencies negative remark resulting in disqualifying the product and thereafter requiring intervention at two levels to get it reinstated.
4) Blue tooth and Wifi are a default module of every product. Today consumer electronic item manufacturers have to submit their products to CRO and WPC to get the necessary permissions to sell in the Indian market. These two subsystems have standard test certificates verifying their functionality from a WPC perspective. These operate at Radio frequencies that are low power and in the free band – ISM band.

It is observed in the notification that the ILAC certificates will be accepted upto 30th June 2022 for Phase-III while the Phase-III itself becomes effective from 01st July 2022. It is requested that ILAC certificates are accepted at least upto 01 year from date of effective implementation date of a phase.

In the previous communication and discussions, TEC had communicated that Test reports of 5year validity would be accepted. However, in the notification dated 22nd September 2021, test report of 2years validity has been asked. We would request TEC to accept test reports of 5 years validity at the time of application.

MAIT strongly recommends that there should be a single consolidated scheme for testing and certification, rather making OEMs visit multiple labs and authorizing bodies like WPC, BIS, TEC, NCCS for getting the testing and certification done.

We would request to consider a single window clearance system for all product certification through one platform with a guaranteed TAT (turn around time) with one control point of Governance within a single Regulatory Organisation similar to OFCOM/ FCC/EU/ACMA or any other ICT regulator in best parts of the world.

There should be no certification overlaps for products within the same country. Until the product overlap issues are resolved within the ministries, TEC either de-notify the overlapping products or put these overlapping products under abeyance. The products which are currently being regulated under MTCTE (Phase – III and Phase – IV), CRO, WPC includes – Smart Watches, Smart Cameras, CCTV, POS, Routers, Equipment's operating under 2.4 GHz to 5 GHz, etc.

General Trivia

MTCTE certification covers five chapters, namely as

a) Safety requirements*,
b) EMI/EMC requirements,
c) Technical requirements (covers functional testing, radio conformance testing),
d) Other requirements (IPv6, Energy consumption rating, SAR, etc.) and
e) Security requirements

The Safety parameters are apparently destructive tests and might damage the products while testing.

Under MTCTE ER all the **non- security testing and certification** is done by **Telecommunication Engineering Centre** – a Centre under Department of Telecommunications (DoT), New Delhi.

1. **Fee for Product categories tested under MTCTE scheme are as below mention**:

Table C.1 – Schedule of Administrative and Evaluation Fee

Group of Equipment	Administrative Fee ₹	Test Report Evaluation Fee ₹
A.	10,000	50,000
B.	20,000	1,00,000
C.	30,000	2,00,000
D.	50,000	4,00,000

However, under the same MTCTE ER the **Security testing and certification** is done by **National Centre for Communication Security** – a Centre under Department of Telecommunications (DoT), which is based in Bangalore.

2. **Fee for ER Security for same Product Categories is additionally charged between 2 – 3.5 lakhs**

Group of equipment	Security Test Report Evaluation Fee ₹
A and B	2,00,000
C	2,50,000
D	3,50,000

Both, TEC MTCTE & NCCS ComSec are part of same Telegraph Act and will use same certification scheme addition Security fee should be levied only Fee need to be charged

ILAC report exemption also does not include safety and EMI & EMC testing.