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Ref.No.MAIT/PY/2635

January 25, 2023

Shri Alkesh Kumar Sharma, IAS  
Secretary  
Ministry of Electronics & IT

**Sub: Requesting support for reduction in certification cost for MSMEs for Common Criteria Certification under STQC**

Respected Sir,

**Greeting from MAIT!**

We thank you for the various initiatives undertaken by MeitY for driving the growth of MSMEs and supporting their efforts for manufacturing under the Make in Indian program and also enabling Ease of Doing Business for them in India. MAIT has a good number of MSME units under its fold engaged in manufacturing of various electronics products like PCs, Set Top Boxes, Servers, CCTVs, Firewalls among many others.

Sir, industry has brought to our notice some of the challenges they are facing w.r.t. certification, which are enumerated as below:-

1. The testing charges of products under Common Criteria Certification (STQC) are very high.
2. Timeline for completion of the testing & certification is too long and the process very complicated.

We would also like to highlight that the Telecommunication Engineer Centre (TEC) has given total exemption of testing fees for DPIIT registered startups and registered MSMEs for a period of 5 years under Voluntary Certification Scheme vide letter number TEC/NR.RC/Tariff/33/2014(Vol II) Dt: 30.03.2022 (same is attached for your reference).

However, the testing charges of Common Criteria Certification under STQC are still very high, as there are multiple levels of testing. **The testing charges for each level are more than a lakh and it is harmonized for all applicants.**

Kindly allow us to cite the case in more detail as below:-

**Example- “Firewalls”:** MeitY assigned STQC to certify Firewalls but the testing charges for this product is between Rs.15 Lakhs and Rs.20 Lakhs. There are MSME units who have a turnover of less than 10 Crore and to pay ~Rs 20 Lakhs as certification fee is not feasible for their business operations. These high fees present a big challenge for an MSME unit to indigenously manufacture Firewalls in India.

Lower testing costs can assist local MSMEs to realize their true growth potential.

We, therefore, request on behalf of Electronics MSMEs to either grant exemption to DPIIT registered Startups & MSMEs for a period of 5 years (similar to TEC’s initiative) or significantly reduce the testing charges so that MSMEs can be cost-competitive & can positively contribute to Make-in-India initiatives.

Looking forward to your positive consideration.

Warm regards,

Col. AA Jafri, Retd.  
Director General

CC: Smt. Asha Nangia, Sr Director & Group Coordinator, Ministry of Electronics & IT

**Telecom Engineering Centre  
(Department of Telecommunications)  
Khurshid Lal Bhawan, Janpath, New Delhi-110001.**

No. TEC/NR.RC/Tariff/33/2014(Vol II)

Dated: 30.03.2022

To

Dy. Director Generals  
Regional TECs  
(Northern/Western/Southern/Eastern)

**Subject: Total Exemption of testing fees for DPIIT registered Start-ups and registered MSMEs for a period of 5 years under Voluntary Certification Scheme of TEC**

Approval of the Competent Authority is hereby conveyed for total exemption of testing fees for DPIIT registered Start-ups and registered MSMEs. The Certificate issued will be valid for a period of 5 years.

2. The exemption, as above, is applicable for a period of 5 years from the date of issue of this letter.



(Anand Katoch)  
Director (RC)  
TEC, New Delhi.  
Off.No. 011-23737409

Copy to:

1. Member (S), DOT-HQ for kind information please
2. Sr.DDG, TEC for kind information please
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