Ref.No.MAIT/PY/2249                                                                 June 02, 2023

Shri Pramod Kumar Tiwari
Director General
Bureau of Indian Standards

**Subject: Request for allowing digital display of information related to Indian Language support for mobile phone handsets that is provided in the instruction manual as per IS 16333 (Part 3): 2022 issued by the Bureau of Indian Standards.**

Respected Sir,

***Greetings from MAIT!***

At the outset, MAIT would like to thank the Bureau of Indian Standards ("**BIS**")" for continuously engaging with the industry stakeholders and addressing their legitimate concerns from time to time.

We are addressing this representation in reference to the 'marking' requirement under the Indian Standard 'IS 16333 (Part 3): 2022' ("**IS 16333**") issued by the Bureau of Indian Standards titled "*Indian Language Support for Mobile Phone Handsets – Specific Requirements*" which is mandatory as per the Electronics and Information Technology Goods (Requirement of Compulsory Registration) Order, 2021 ("**CRO**")[1].

Briefly, IS 16333 mandates mobile phone manufacturers to comply with the following requirement[2]:

> "***Each mobile phone handset shall be packed with an instruction manual to furnish the following information*** in addition to the information given in 5.1 of IS 16333 (Part 1):
> *6.1 The Indian official languages that the mobile phone handset is capable of sending the text in.*"

Accordingly, **the above-mentioned mandate, requires information pertaining to Indian official languages that the mobile phone handset is capable of sending the text to be provided in the instruction manual** *packed with a mobile handset*.

Since IS 16333 does not provide the option for the instruction manual to be made available online, to ensure compliance, all the extensive information pertaining to the Indian language support for mobile handsets prescribed in IS 16333 is printed on the physical instruction manual/handset that is inserted in the product packaging of mobile phones. However, with the advancement in technology and growing acceptance as well as expectation of consumers to access relevant information online, providing such information in instruction manuals that are in the form of a physical booklet can have the unintended negative repercussion of consumers disposing of the physical booklet/manual after purchase along with the product packaging thereby leading to loss of important information. Additionally, a physical instructions booklet/manual will require consumers to take special precautions to ensure that the booklet/manual is preserved for future reference.

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1 Available at https://www.meity.gov.in/writereaddata/files/CRO2021-and-ammenment.pdf

2 Paragraph 6, IS 16333 (Part 3): 2022, Indian Language Support for Mobile Phone Handsets – Specific Requirements.

Given the ease and growing acceptance of using digital methods for accessing information through smartphones, and, increasing consumer behaviour towards accessing and using online resources, it is recommended that digital alternatives instead of physical reproduction of information should be adopted. Such adoption of digital/online alternatives to physical booklets/manuals will ensure quick access to important information by the consumer and also not lead to loss of such information since information in the digital format will be permanently available to the consumer and will also not require additional precautions at the consumer's end of preserving a physical object.

Digital display of information through online links/e-labelling/QR Code also allow manufacturers of mobile handsets to provide a broad range of important compliance related information in a simple, convenient, permanent and easily accessible manner. Such digital display of information is not only cost effective but also helps in reducing waste and enables faster roll out of products, thereby reducing compliance burden in the interest of facilitating ease of doing business.

Accordingly, the information display requirements under IS 16333 issued by the BIS regarding the display of information related to Indian language support for mobile handsets is dated and we strongly recommend adoption of modern and digital methods for displaying such information through online links/e-labelling/QR Code.

Digital modes of accessing important regulatory information have already been adopted in other regulations which allow for the use of e-label/QR Code/electronic display of such information. The same has been mentioned below:

a.  The Legal Metrology (Packaged Commodities) Rules, 2011 allow limited use of QR Codes on labels of electronic products manufactured/packaged/imported after 15th July 2022.[3]

b.  Bureau of Indian Standards (Conformity Assessment Regulations), 2018[4] read with the BIS Electronic Labelling (e-labelling) Guidelines, 2017 allow devices with an integrated display screen to present the required labelling information including BIS "Standard Mark" electronically in lieu of a physical label on the product.[5]

c.  The Mandatory Testing and Certification of Telecom Equipment Procedure ("**MTCTE Procedure**") issued in May 2021 permits "*e-label of TEC Certification in case of Telecom / related ICT equipment with integrated displays in lieu of physical labelling*".[6] Additionally, the MTCTE Procedure also allows certain information to be provided in the form of machine readable i.e., two dimensional code (QR code, etc.) in case sufficient space on parts, items or product is not available for marking labelling information.[7]

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3 The Legal Metrology (Packaged Commodities) (Second Amendment) Rules, 2022. Available at

https://consumeraffairs.nic.in/sites/default/files/uploads/legal-metrology-acts-rules/Notification%20-%20%20Legal%20Metrology%20%28QR%20Code%29.pdf

4 Scheme-II of Schedule-II of Bureau of Indian Standards (Conformity Assessment) Regulations, 2018. Available at https://www.bis.gov.in/wp-content/uploads/2019/03/BIS_CA_12032019.pdf

5 The Electronic Labelling (e-labelling) Guidelines, 2017. Available at

https://www.crsbis.in/BIS/app_srv/tdc/gl/docs/E%20LABELLING%20GUIDELINES%20registration.pdf

6 Paragraph 2.0, Annexure D, Mandatory Testing and Certification of Telecom Equipment Procedure, May 2021. Available at

https://tec.gov.in/pdf/MTCTE/MTCTE_PROCEDURE_amend.pdf

7 Paragraph 4.0, Annexure D, Mandatory Testing and Certification of Telecom Equipment Procedure, May 2021.

d.   Furthermore, under the Consumer Protection (E-Commerce) Rules, 2020, any seller offering goods or services for sale through a marketplace e-commerce entity is required to provide information about the goods and services offered on its platform or website.[8]

e.   At an international level as well, considering the growing acceptance of e-labelling, international organisations, such as International Organisation of Standardization (ISO), have developed standards for digital representation of product information for electronic devices with integral display.[9]

Considering the foregoing regulations which allow for displaying information through a QR code/e-label/online links, **we request that the BIS extend a similar regulatory allowance for permitting the instruction manual (displaying information relating to the Indian language support for mobile phone handsets) to be made available online or through QR Code/e-label instead of mandatorily providing the same through a physical instruction's manual**.

We hope that the above stated concerns and recommendations pertaining to allowing the electronic display of information related to Indian language support for mobile phone handsets will be taken into consideration and we look forward to a favourable response. We remain available for any further discussion/clarifications that the BIS may have in this regard.


Warm regards,

Col. AA Jafri, Retd.
Director General


CC: Shri N Suryanarayanan, Head - Central Marks–III, Bureau of Indian Standards

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8 Rule 6(5), Consumer Protection (E-Commerce) Rules, 2020. Available at https://consumeraffairs.nic.in/sites/default/files/E%20commerce%20rules.pdf

9 ISO/IEC 22603-2:2022 - Information technology — Digital representation of product information — Part 2: Requirements for electronic devices with integral display. Available at https://www.iso.org/standard/82070.html