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December 13, 2019

Shri Rajiv Kumar
Joint Secretary
Ministry of Electronics & IT

Subject: Reconsideration of request pertaining to R-Numbers on the CRS portal

Respected Sir,

Greetings from MAIT!

This has reference to the recent request placed by STPI on November 27, 2019 to electronic and consumer product manufacturers/suppliers to provide R-Numbers on the CRS portal. The last date for submission of this information is December 15, 2019. We would like to submit that the information sought will be a challenge for the manufacturers/representatives of global manufacturers in the stipulated time.

The specific challenges faced by the electronic and consumer product manufacturers/suppliers are:

1. Most information already available on BIS portal:

We would like to bring to your notice that all domestic manufacturers/representatives of global manufacturers periodically share the information pertaining to the R-numbers with BIS as mandated under India's Compulsory Registration Scheme (CRS) for Electronic Products. With an exception to the information pertaining to Made to Order products, all other information is already available with BIS.

You will appreciate that each exercise undertaken by electronic and consumer product manufacturers/suppliers is a tedious project and a repeated effort is an exercise in futility.

2. Dynamic nature of information, especially market price:

As mentioned earlier, the information requested by STPI includes market information for Made to Order and Not Made to Order products. Among all the electronic products available in the market, there are many electronic products that are made to order for customers/partners, e.g. power adaptors. The information requested includes market price of the product which is dynamic in nature, especially for made to order products. Therefore, collation of such a varied information, which is likely to change is challenging for domestic manufacturers and representatives of global manufacturers.

3. Time required to collate information:

You will appreciate that there are around 30 product categories that qualify for India's Compulsory Registration Scheme (CRS) for Electronic Products. Each of these categories have related models (*some products have upto 500 different models*), depending on the need of the domestic customer. To collate the most up-to-date information (existing and new) is a long-drawn exercise as there are multiple suppliers, partners for each model/category of product. Therefore, the time provided for this exercise is limited, given the magnitude of information sought.

We appreciate the efforts of STPI/BIS in registration of electronic products in the country before introduction in the market. This enables introduction of high-quality products for our consumers. However, repeated, sporadic and time-bound requests as mentioned earlier, hamper the ease of doing business for the industry. It also hampers India's vision to become an export-led global electronics manufacturing hub.

Considering this, we seek your assistance in limiting STPI's request to information that has not yet been shared with BIS and increasing the timeframe for compliance.

We also request to have a workshop with industry to discuss what is required for an effective compliance procedure.

We look forward to positive response to our request at the earliest.

With regards,



George Paul
Chief Executive Officer