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Ref.No.MAIT/PY/2199

September 03, 2020

Shri Saurabh Gaur  
Jt. Secretary  
Ministry of Electronics & IT

**Subject: Request for extension in timeline for CRO Phase IV as notified on April 1, 2020 by MeitY**

Respected Sir,

***Greetings from MAIT!***

This bears reference to our previous requests for extension in Implementation timeline of CRO Phase IV notified on April 1, 2020 which is on the expiry of six months from the date of notification i.e. October 1, 2020. In our representation dated 10th April 2020, Ref.No.MAIT/PY/2078 (copy attached) and subsequent requests, MAIT shared its concerns on the enforcement timeline provided by MeitY, requesting the extension in timeline of implementation of CRO Phase IV.

We would like to bring to your notice that under the CRO-IV, there are products under testing and CRO number to be given by BIS shortly. Once received, the industry will need at least 8-12 weeks to incorporate it into the production lines and then ship into India to meet the demand. In the absence of an extension in timeline on CRO IV, we will have a break in the supply chain.

Additionally, with the festive season of Diwali coming up, nearly all our members also have material which is getting ready / ready for shipment. These will reach India after the cut-off date and will get stuck at customs unless relief is provided.

Since this is an urgent and important matter, we request you for your immediate intervention.

Looking forward to a positive consideration towards this request.

With regards,

George Paul  
Chief Executive Officer

CC: Ms. Asha Nangia, Sr. Director, Ministry of Electronics & IT



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Ref.No.MAIT/PY/2078

April 10, 2020

Shri Ajay Prakash Sawhney  
Secretary  
Ministry of Electronics & IT

**Subject: - Deferment of Roll out of CRO Phase IV until new standards are adopted by India**

Respected Sir,

This bears reference to Implementation timeline of CRO Phase IV notified on April 1, 2020 which is on the expiry of six months from the date of notification i.e. October 1, 2020.

In this context, on behalf of its members, MAIT would like to submit the following: -

1. The enforcement timeline provided by MeitY is very aggressive. We would request MeitY to provide at least a one year's time for enforcement from the date the FAQ is issued by MeitY; TRF is issued by BIS; product series guidelines are issued by MeitY and BIS portal is ready to accept the application. In addition, MeitY would agree that due to the COVID-19 pandemic, the Global suppliers are constrained and can't send sample for testing at present.
2. BIS is already in the process of developing IS for IEC 62368-1 and it is expected that BIS would migrate to IEC 62368-1 by end of 2020. As soon as the new Standard is rolled out, all the existing products need to be re-tested to IS version of IEC 62368 & again registered with BIS with new R No. Thus, adding more products for compliance in the existing standard of IS 13252 & IS 616 will duplicate the compliance cost which will be huge for the industry. In such a scenario, **we would request MeitY to defer the roll out of CRO-4 until the new standards are adopted by India**, since the changeover would entail double testing almost as soon as the registration is obtained for these product categories.

Looking forward to your favourable consideration of our request and defer the roll out of CRO Phase-4 until new standards are adopted by India.

With regards,

George Paul  
Chief Executive Officer

CC: Shri Saurabh Gaur, Jt. Secretary, Ministry of Electronics & IT  
CC: Ms. Asha Nangia, Sr. Director, Ministry of Electronics & IT