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Smt. Chitra Gupta  
Scientist-F & DDG (FMC, HM & Registration)  
Bureau of Indian Standards

**Subject: Request to modify the publish date limit from 90 days to 120 days for CRS products**

**Reference: Registration/G-12 dated 15<sup>th</sup> July 2020**

Respected Madam,

***Greetings from MAIT!***

At the outset, we would like to thank BIS for implementing the confidentiality option for the CRS products. By accepting the industry request, BIS has taken a momentous step towards further enabling the Ease of Doing Business in the country.

As per the circular issued vide reference cited above, an applicant can provide the publish date of a model in the BIS portal. However, the portal sets a limit of 90 days for an applicant to seek the *Publish date* of a certificate. As experienced by the industry, there are multiple cases or situations where an OEM may need to test and certify a new product/model at least 4-5 months before the public announcement of a market launch. This situation may arise due to:

1. The lead time of testing and certification of associated accessories and Inbox components gets added to the lead time of the host product. To cite an example - the batteries or power adapters of IT products or power banks (charging case) of audio products need to be tested before the host device. It is necessary to maintain the confidentiality of each associated device as well as the end product.
2. For the global launch of a new product, there are many regional certifications efforts to be sought earlier than the public announcement due to testing and certification lead times and to handle supply chain/logistics challenges.
3. Many a time, due to dynamic business scenarios and supply chain constraints, the public announcement date of a new product may change than originally planned or get deferred by a few days, weeks or months.

Considering the above challenges and uncertainties, we would humbly request BIS to increase the current 90 days limit of selecting a publish date to a 120-day window. This will further enhance Ease of Doing Business and allow OEMs to align the certification timelines with the marketing plans for new launches.

Thank you in anticipation!

Warm regards,

Col Suhail Zaidi (Retd)  
Director General

CC: Shri S.K. Dutta, Scientist-E & Head- Registration, Bureau of Indian Standards