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May 30, 2023

Shri R R Mittar
Sr. DDG & Head, TEC
Department of Telecommunications

Subject: Request for extension of implementation timelines for MTCTE Phase-3 & Phase-4

Respected Sir,

Greetings from MAIT!

MAIT and its members express deepest gratitude for the recent series of relaxations made by DoT in the MTCTE regulatory framework. We thank you and your esteemed team at TEC for recognizing the importance of creating a favourable regulatory environment for growth, innovation, and investment in India.

The multiple moderations in MTCTE regulation have a significant positive impact on the ICT and Telecom industry. In particular, the removal of regulatory overlaps between CRO and MTCTE, exemptions given to End-of-life Whole unit replacements, reduction of the TEC's processing fee, increase of the MTCTE certificates validity, and simplification of the MTCTE labelling requirement, reflects the Government's commitment to create an enabling environment that encourages investment and foster technological advancements.

The ICT Industry, as a responsible stakeholder in India's Digital Transformation Mission, is committed to comply with all the mandatory compliance requirements of the country and support the MTCTE regulation. Our member companies are putting best of their efforts to meet the MTCTE requirements and have certified a major portion of the product portfolio. However, there are still considerable number of models pending for testing and certification. And, with Phase-3 and Phase-4 implementation date fast approaching, we fear that the industry would not be able to meet the compliance requirements, and this would cause huge business disruption.

MAIT has collated the below data from our member companies to do a reality check on the compliance status. You would note that approx. 62% of models have still not been certified and they can't be shipped to India post June 30, 2023:

S. No.	Product Category	Total number of Models in scope	No of models certified	No of models pending for certification
1.	LAN Switches	217	125	92
2.	Routers	50	2	48
3.	Firewall	55	6	49
4.	Conferencing Equipment	5	0	5
5.	GPON	2	0	2
6.	Equipment operating in 2.4Ghz and 5Ghz	75	28	47
7.	DWDM	1	0	1
8.	PTP PMP	3	2	1
9.	IP and its related Security Equipment	25	3	22
10	Microwave products	3	0	3
11	Radio Products	14	5	9

12	Optics related products	4	0	4
	Total	454	171	283

Though all the stakeholders - industry, labs, as well as TEC, are working continuously to meet the compliance requirements, but due to multiple operational challenges like disruptions in the Global supply chain, unavailability of sufficient labs to perform technical parameter testing, etc., industry is struggling to ensure 100% compliance of the product portfolio by 1st July 2023.

For smooth and effective implementation of any new regulation, it is important to give sufficient time for the system to adapt and stabilize. In 2021, when Phase 3 and Phase 4 was announced, industry had anticipated the risk of falling short on time to ensure compliance and had requested for 18 to 24 months for enforcement.

In line with our previous requests and considering the huge number of products that still need to be certified, we humbly request your good offices to extend the implementation timeline for Phase-3 and Phase-4 products from July 1, 2023 to Jan 1, 2024.

The extended timeline would allow for smoother transition, ensuring optimal compliance while minimizing disruption to operations and services. The extension will also provide the industry stakeholders with the necessary breathing space to ensure seamless and efficient implementation of the MTCTE regulatory requirement.

We request and eagerly anticipate a favourable consideration on our submission for an extension of the timeline of MTCTE Phase 3 and Phase 4 by 6 months (i.e., from July 1, 2023 to January 1, 2024).

We look forward to an opportunity to further discuss and share industry views to facilitate an effective regulatory framework in India.

Warm regards,



Col. AA Jafri, Retd.
Director General

CC: Shri Anand Katoch, DDG (TC), TEC