



PHD House, 4th Floor, Ramakrishna Dalmia Wing
4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110016, India
Tel#: (+91-11) 2685 5487 • Fax#: (+91-11) 2685 1321
E-mail: ceo@mait.com • Website: <http://www.mait.com>

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