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April 15, 2020

Shri Ajay Prakash Sawhney
Secretary
Ministry of Electronics & IT

Subject: - Request for releasing revised FAQ and clarifications on industry concerns on Standalone SMPS, Keyboard, Electronic Musical System and Wireless Headphones/Earphone brought under the scope of CRO as notified on April 1, 2020 by MeitY

Respected Sir,

This bears reference to CRO Phase IV as notified on April 1, 2020 where 12 new products were brought under the scope of CRO. MAIT on behalf of its industry members seek the following changes from **MeitY** on the following product categories: -

1. SMPS

Defining of SMPS is critical for the industry for compliance. Hence, **we would request MeitY to release the definition of Standalone SMPS.**

A. Industry Proposes the following definition for SMPS: -

A Standalone SMPS is an external device which is outside of the host IT equipment, which are regulated under the CRO, and comes with a chassis to provide power to the host device. It is manufactured and/or imported and sold as a final product to the end consumer. The CRO-Phase 4 does not include SMPS imported as component / spares/ for warranty replacement / options/assembly/ SMPS embedded on PCB.

MeitY to consider this definition of SMPS and incorporate this in their FAQ so as no ambiguity is there in the understanding for compliance.

B. Industry understands that Standalone SMPS limits only to power supplies of products which are already under the scope of CRO.

Industry requests MeitY to bring the SMPS for those products under CRO Phase-IV which are already in scope of CRO and do not extend the scope to non-CRO products. **In order to have no ambiguity on compliance requirements, MeitY is requested to confirm industry's understanding and incorporate it in its FAQ**

Besides the definition of SMPS and Standalone SMPS being limiting to power supplies of products already covered under the scope of CRO; **a few of industry members have additional questions which are included as Annexure 1. MAIT requests you to provide clarity on those points**

2. KEYBOARD

Industry understands that only keyboard with a USB connectivity when imported as standalone finished product, is in scope of CRO-4. Keypad /keyboards/and alike built into a host product (like notebook/laptop/POS/KVM/large format Printers/etc) when imported as a spare/whole unit replacement shall be exempted from the CRO. **In order to have no ambiguity on compliance requirements, MeitY is requested to confirm industry's understanding on Keyboard and incorporate it in its FAQ.**

3. ELECTRONIC MUSICAL SYSTEM WITH INPUT POWER BELOW 200 WATTS

Industry understands that an Electronic Musical System is an equipment which can playback, amplify and reproduce audio through Mains. Consumer wireless music devices with WiFi-Bluetooth-USB functionality which does not have the ability to playback are not Electronic Musical System and hence not in scope of CRO based on MeitY's FAQ no 9, revision no 14 at page no 13, dated Feb 2019.

In order to have no ambiguity on compliance requirements, MeitY is requested to confirm industry's understanding on Electronic Musical System with input power below 200W and incorporate it in its FAQ

4. WIRELESS HEADPHONE AND EARPHONE

Industry is requested for a clarity about the testing & certification requirements in upcoming revised FAQ for Wireless Earphones having an integral charging case with a rechargeable battery inside. Does charging case need to be tested and registered along with earphones as a single product or to be registered separately as an accessory to the earphones? If it has to be registered separately, then under which product category, a charging case will fall under CRS?

We look forward to a favourable consideration to industry's request as mentioned above (and in **Annexure-1**) and issue clarifications through a revised FAQ.

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



Annexure 1

Additional Clarity Required on SMPS

1. If industry is importing SMPS (Power supply) as a spare part without any enclosure/connectors & thereafter using it inside a CRO regulated product category to input power during its manufacturing process. In such a case, is there a need to take a separate registration number from BIS since it is not imported as a standalone finished product?
2. IS standard for Standalone SMPS mentioned in CRO notification is IS 13252. Industry understand that CRO phase IV is applicable for the IT products only i.e. Monitor, ADPM etc. which are globally tested under its corresponding IEC standard 60950?

Please clarify that Standalone SMPS is applicable for IT products only & not to other products i.e. TV, Refrigerator, AC, Washing Machine, Networking products, etc.?

3. In many products, SMPS is part of main PCB as a Combo (Power supply unit + main PCB). Will this combo be also considered as standalone SMPS & will it require a separate BIS registration number?