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Ref. No.MAIT/PY/2540

September 29, 2022

Shri Amit Agrawal, IAS
Additional Secretary
Ministry of Electronics & IT

Sub: Clarification regarding applicability of the new product categories under CRO V

Ref: MAIT Representation No.MAIT/PY/2266 dated: 03/03/2021 (attached)

Respected Sir,

Greetings from MAIT!

This bears reference to a long-pending concern raised by one of our member companies namely Amazon Seller Services Pvt Ltd. with respect to the applicability of the new product categories under CRO-V scheme notified on 01st October 2020 with an effective date of 01st April 2021. Kindly refer to the attached representation filed with BIS (with CC to MeitY) dated March 3, 2021.

Sir, to give you a background of the issue; we are reiterating the concern as below: -

Issue: -

MeitY had informed the Member in 2019, that its Alexa/Echo (Digital Media Receiver) devices (with and without display) are covered under CRO-I Scheme. Basis this clarification, certifications under ADPM category were obtained from BIS for the relevant products.

Now, CRO-V has introduced a separate product category called 'Smart Speakers (with and without Display)' under the IS 616 standard and some of the Members registered & upcoming devices are matching with this new category too, in addition to falling under the 'ADPM' category. Currently, about **19** existing devices manufactured by the Member are already carrying BIS certificates under the ADPM category. The complete list of existing devices, model number along with BIS R-number are as follows: -

S. No.	Models	Product Name (Product category)	BIS R- number
1	H23K37, J9G29R, C78MP8, C7H6N3, 36EBT3, B7W644, B7W64E, A8H3N2, C76N8S	Digital Media Receiver (ADPM)	R-41125814
2	AV8V3N	Media Streaming device (ADPM)	R-41129909
3	O2T2V3, R9P2A5, L4S3RE	Digital Media Receiver (ADPM)	R-41130885
4	T4E4AT	Digital Media Receiver (ADPM)	R-41162132
5	BP39CN	Digital Media Receiver (ADPM)	R-41137570
6	VN94DQ	Digital Media Receiver (ADPM)	R-41124036
7	DW84JL, C77A68	Digital Media Receiver (ADPM)	R-41121177
8	RA73E6	Digital Media Receiver (ADPM)	R-41138762

There has been no change to any of the products listed above, and they continue to be sold in the Indian market.

In the context of understanding the applicability of the new category to the Member's existing products, we would like to draw your attention to the best practices adopted by most of the countries to enable ease of doing business. The Member had obtained certifications for its devices in good faith based on written instruction received from MeitY, and would like to avoid any impact to its business due to subsequent changes in the certification regime and the duplication of effort in having to obtain fresh certifications for the same products. We, therefore, request that the company be permitted to continue import, sell and renew its existing models under the existing R-number as per the BIS issued certificate till the end-of-life of product. All new models will be registered by the Member in the appropriate category (including CRO-V, as applicable).

Request: - A written clarification from BIS will help the Member proceed in the right direction. We solicit the support of MeitY to get that written clarification issued by BIS.

We look forward to hearing from you soon.

With regards,



Col. AA Jafri, Retd.
Dy. COO
(Acting Director General – MAIT)

CC: Ms. Asha Nangia, Sr. Director, Ministry of Electronics & IT
CC: Dr. Bharat Kumar Yadav, Jt. Director, Ministry of Electronics & IT
CC: Shri Navindra Gautam, Head - Registration Department, Bureau of Indian Standards