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Ref.No.MAIT/PY/2511

August 02, 2022

Shri Amitesh Kumar Sinha
Joint Secretary
Ministry for Electronics and Information Technology

Subject: Request to provide the option for Parallel and Sequential testing at the time of applying for BIS Certification of "Electronics and IT Goods (Requirements for Compulsory Registration) Order, 2012"

Respected Sir,

Greetings from ***MAIT***, India's apex industry body empowering IT, Telecom & Electronics Hardware Sectors!

At the outset, we would like to convey our deep appreciation of the Ministry for Electronics and Information Technology for enabling Ease of Doing Business and setting global standards for regulating the highest level of product safety and quality. We are also thankful for the support provided by MeitY to the industry through various initiatives/incentives under "Make in India" to promote domestic manufacturing and exports.

With reference to the Gazette Notifications for CRO phases, we would like to bring to your attention the extra time taken in certification due to the current practice of sequential testing

Present BIS testing methodology follows sequential testing in which the final certification requires testing of all related assembly & sub-assembly certifications to be done sequentially i.e. next testing depends on the completion of the previous test.

However, instead of sequential testing if parallel testing is adopted, it will save testing time because for certain assembly & sub-assembly level applicants can get to test them parallelly to get the final certification done in a short period of time.

Sir, in traditional BIS product certification, parallel testing can save time in certain product categories. Apart from the reduction in testing time, parallel testing also helps in reducing resource allocation.

Kindly refer to Annexures I, II & III giving details of the three types of CRO product testing savings.

Annexure-I: Power Bank for Portable Applications & Wireless Earphone testing time can be reduced from 12 weeks to 6 weeks if testing with an external source/Test jjg is allowed for Wireless Earphone. There will be no impact on the testing procedure/safety of the products and they will continue to comply with the existing safety standards without impacting the safety of testing personnel in the labs or the end consumer.

Annexure-II: Mobile Phone and its parts (Cell and Battery) testing time can be reduced from 21 weeks to 13, 16 & 8 weeks respectively to the proposed process, if parallel testing is adopted.

Annexure-III: Server and its power Supply (Power adaptor for IT equipment) testing time can be reduced from 15 Weeks to 11 weeks if Server testing is permitted with power supply registration.

In this regard, **MAIT requests you to kindly provide an option for applicants to undertake Parallel Testing at the time of application which will help the industry in reducing 'Time to Market'.**

Looking forward to your support.

With regards,

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

CC: Shri Rohit Kumar Singh, IAS, Secretary, Department of Consumer Affairs
CC: Shri Pramod Kumar Tiwari, IAS, Director General, Bureau of Indian Standards
CC: Smt. Asha Nangia, Sr. Director, Ministry of Electronics & IT