



PHD House, 4th Floor, Ramakrishna Dalmia Wing  
4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110016,  
Tel# 9599665859 E-mail: [ajafari@mait.com](mailto:ajafari@mait.com); Website: <http://www.mait.com>

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November 18, 2022

Shri Ashwini Vaishnaw  
Hon'ble Minister of Railways  
Communications, Electronics and Information Technology  
Government of India

**Subject: Request for removing export requirements and extension in timelines for registering IMEIs of locally manufactured phones.**

**References:**

1. G.S.R. 728(E) dated 26th September, 2022 issued by DoT
2. DoT letter no 13-15/2021-UDS dated 27<sup>th</sup> Oct, 2022

Hon'ble Sir,

***Greetings from MAIT!***

Regarding the subject mentioned above and the subsequent clarifications issued by DoT on 27th October 2022 wherein it was clarified that locally manufactured phones meant for exports too will have to be registered with the ICDR portal of DoT apart from the registering IMEIs to be sold and used in the Indian market.

For **mobile phones meant for export**, we would request DoT to kindly consider the following aspects:

- Registration of IMEIs is regulated by the importing country and OEMs are expected to comply with the local rules and regulations of that particular country.
- Registering IMEIs creates an impediment to the Ease of Doing Business in the country by hampering export with the undue addition of rules making manufacturing in India complex.
- Countries importing mobiles may object to storing such IMEI data in other countries.
- As an international body, GSMA is handling TAC allocations on a global basis. The organisation can be approached to handle TAC/IMEI for the countries that wish to have this data.


The whole industry unanimously opposed the registering of IMEI data meant for exports and the same was conveyed to DoT Sr. Officials when DoT organised the ICDR portal demo on 14th November 2022. However, DoT has added an export IMEI registration data tab in the proposed ICDR portal and told the industry to register IMEIs data of mobile phones locally manufactured and meant for exports with effect from 01<sup>st</sup> January 2023.

**To enable the industry to comply with the new rules in letter and spirit, we would earnestly request DoT to:**

- 1. Remove the requirement of registering the IMEIs of mobile phones meant for export.**
- 2. Give at least 3 months for the rules to be effective after the SOP and the ICDR portal to go live.**

We hope that the DoT considers the above submissions to enable the Ease of Doing Business in the country and allow the industry to work and contribute to the national agenda.

Warm regards,



Col. AA Jafri, Retd  
Acting Director General

- CC: Shri K. Rajaraman, IAS, Chairman DCC & Secretary Telecom, Department of Telecommunications  
CC: Shri Alkesh Kumar Sharma, IAS, Secretary, Ministry of Electronics & IT  
CC: Dr Mahesh Shukla, Member (Services), Department of Telecommunications  
CC: Shri Amitesh Kumar Sinha, IRAS, Joint Secretary, Ministry of Electronics & IT  
CC: Shri P.K. Singh, Dy. Director General (Security Assurance), Department of Telecommunications  
CC: Smt. Manmeet Nanda, IAS, Joint Secretary, DPIIT