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Ref.No.MAIT/PY/2178

July 23, 2020

Shri Saurabh Gaur  
Jt. Secretary  
Ministry of Electronics and Information Technology

**SUBJECT: Request for extension in timeline for CRO Phase IV as notified on April 1, 2020 by MeitY**

Respected Sir,

***Greetings from MAIT!***

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 our letter dated 10 April 2020, MAIT shared its concerns on the enforcement timeline provided by MeitY, requesting the deferment of roll out of CRO Phase IV.

In this context, on behalf of its members, MAIT would like to submit that many products are still pending for testing due to:

- Lockdowns in various cities.
- Delay in release of FAQs and Product Series Guidelines, which were published on 20th and 26th May, respectively.
- Delay in release of the Test Report Format (TRF) by BIS, which is still pending.

Although labs have started testing products (and have completed the testing in a few cases for some models), the labs have not yet shared the test reports because BIS has not yet issued the TRF. Without the test reports, applications for BIS registration cannot be submitted. Once products are tested and registered by BIS, each registered product is required to be re-labelled with the BIS registration number, a process which needs a minimum of two months to complete. Considering the above and the slow movement of operations due to COVID-19, **MAIT respectfully requests an extension of one (1) year, making the date of enforcement 1st October 2021.**

Thank you for your continuous support and looking forward to your favorable consideration.

With regards,

George Paul  
Chief Executive Officer

CC: Shri Ajay Prakash Sawhney, Secretary, Ministry of Electronics & IT  
CC: Ms. Asha Nangia, Sr. Director, Ministry of Electronics & IT



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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