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Ref.No.MAIT/PY/2597

November 25, 2022

Smt. Asha Nangia
Sr Director
Ministry of Electronics & IT

Subject: Stakeholder consultation for notifying of Security, Essential Requirements for EMI/EMC and Security requirements for mobile phone devices etc under CRO — regarding

Respected Madam,

Greetings from MAIT!

Please refer to the MeitY mail dated 21st November 2022 on the subject.

We are writing to draw your attention to the fragile prevailing world geopolitical condition which has created circumstances where world economies are either in recession or are staring at it in the near future. Even large economies are contracting and there is no doubt that global growth and even India's growth has slowed. Post-Covid recovery has been slower and India is one of the rare economic bright spots that exist in the world today. MAIT feels that in these challenging times, it is necessary that disruptive changes in policy that affect time to market or general trade are not introduced as they tend to accentuate the already grim macro-economic outlook.

1. Need for the introduction of IS 62638 Part I:2018 “Audio/Video, Information and Communication Technology Equipment Part 1 Safety Requirements (First Revision), for products covered under CRO

Industry would need three years to meet the global compliance timeline, in order to implement the new standard it should be applicable to the new products only after the mandatory date of compliance.

2. Need for the introduction of EMI/ EMC requirements for products covered under CRO

BIS has formulated many standards, however, not all of them have been introduced/enforced compulsorily unless there is a cause that calls for their introduction. The cause could be linked to product failures or international obligations etc. Introduction of new standards of EMI and EMC requirements for products covered under CRO have no such background (at least not to the knowledge of the Industry). It would be good if the same can be elucidated so that the Industry can understand the rationale for its need in the first place.

3. Mobile device security standards (IS 17737(Part 3): 2021- Mobile Device Security Part 3 Security Levels)

As we understand, Mobile phones are presently governed under CRO/ CRS. The industry has been informed by DoT (NCCS) that they have also formulated detailed ITSAR for Mobile Security. While the industry appreciates the need for security, from an ease of doing business perspective, the Industry should have only one set of

Security Standards. Having two different ministries draft different guidelines/standards on the same subject will cause a definite challenge. MAIT would therefore request that the issue of concurrent regulations and overlap should be resolved.

Light touch regulations & Ease of Doing Business

The growth of the Electronics Industry from a mere \$8.3 Bn in 2014 to \$70.7 Bn in 2022 has been on the back of light touch regulations. Ease of Doing business has been at the forefront of Policy making and implementation at all levels in the Ministry. In this context, when compliances are being reduced/rationalized, introducing fresh compliances would adversely affect Time to Market and costs. Both these factors would adversely affect the tempo of growth that is already under intense pressure from global factors beyond India's locus of control. We would like to highlight that these new requirements will bring an onerous burden on OEMs in meeting multiple compliances. If these are actually brought into implementation mode, it would be virtually impossible for OEMs to launch new products in India in sync with global launches. At a time when India is going shoulder to shoulder with major economies, these new requirements will push the industry into a near impossible situation and also deprive Indian consumers from availing new products, new technologies and features and functionalities that are introduced in the developed world.

Request for additional time for detailed industry comments

The time provided for consultation is inadequate for carrying out consultation within the large Electronics industry. MAIT requests that at least three weeks' time be provided to enable the Industry to file detailed comments on the subject.

Summary of Asks

Apropos, the requests from the industry are summarised below:

1. Relook into the rationale of introducing new requirements which impact EoDB in the country and the impact on the launch new products/models. The new testing and certifications will push the growing industry to bend backwards to meet the ever growing new requirements from multiple ministries/departments/agencies.
2. Clarity on the need for sudden implementation of EMC/EMI requirements and Security requirements
3. Need for resolving the issue of concurrent guidelines on the subject of IS 17737 (Part 3): 2021 being approached by DoT and MeitY simultaneously.
4. Additional time of 3 weeks for detailed industry comments

We look forward to your positive consideration of the issues that have been highlighted.

Warm regards,



Col AA Jafri, Retd
Director General