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Shri K. Rajaraman, IAS
Chairman DCC & Secretary
Department of Telecommunications

Subject: Concerns on consideration of Country-of-Origin for MTCTE certification

Respected Sir,

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

We are writing this to bring light to the consideration of Country-of-Origin under the Mandatory Testing and Certification of Telecom Equipment Scheme (MTCTE), and non-issuance of certificates for products originating in China.

We acknowledge the current geopolitical shifts and India's aspirations to become a global electronics manufacturing hub. As you may be aware, several of our members have been committed to this cause and have been investing in India for decades, from software exports to R&D and manufacturing of critical IT & telecom products. Several members are also applicants to the PLI schemes, directly or indirectly.

You would appreciate that shifting of any telecom supply chain is a medium-long term strategic decision, based on reasons like shifting costs, commercial requirements, geopolitical developments, labour requirements or business resiliency. Over the last two years, several global companies have diversified their supply chains for several reasons.

We would like to bring to your notice that despite such actions and commitments, we are noticing that telecom products with COO China, tested by Indian labs, are not getting certificates under the MTCTE scheme. The objective of the scheme is to ensure that the telecom product meets the right standards, does not degrade performance of the network and safety of the consumer, and do not have any linkage with the supply chain security. Industry is duly committed to completing testing across all parameters, including security. Therefore, **we request if a telecom product shows conformance to the standards prescribed in the Essential Requirements (ER) finalised by a technical certification body like TEC, then it should be granted an MTCTE certificate.**

Further, we would like to state that the National Security Directive for Telecom Scheme (NSDTS), which provides 'Trusted Source', and 'Trusted Product' certification is limited to products installed in the Indian public telecom network. This does not expand to products sold to enterprises or public sector. Considering this, the **NSDTS and MTCTE should not be coupled.**

It is requested that a pragmatic timeline in consultation with the industry be provided to address the Country-of-Origin issue. Meanwhile, we urge you to allow certification of the duly tested products as otherwise, there will be serious disruption of marquee public and private sector digitization projects.

Warm regards,


Col Suhail Zaidi (Retd)
Director General