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March 23, 2022

Smt. Deepa Tyagi
Sr DDG and Head, TEC
Telecom Engineering Centre

Subject: Issues related to MTCTE's labelling requirements and resolution

Respected Madam,

Greetings from MAIT!

We would like to take this opportunity to thank TEC for its continued support to the industry in regulatory related issues.

We are writing regarding a specific issue related to the labelling requirements asked in the MTCTE program. While TEC has issued guidelines for the labelling requirements in the MTCTE procedure 2.1 and subsequent clarification issued on 28th Oct 2021, there is an issue in the current guidelines that need redressal from your end.

Problem Statement:

- a. As per the FAQ on the MTCTE portal, TEC issues the Registration Certificate number only after final approval of the product.
- b. The labelling guidelines in the latest MTCTE procedure 2.1 (Annex 4, clause A4.6) allow labelling in advance when the manufacturer conforms to ER.

An OEM starts manufacturing/production planning for any product at least 3-5 months before introducing the new product to the market to build up the inventory. Considering this scenario, it is not practical to print/e-label the TEC label after the TEC certificate is issued, insert it in the product and also meet Time to Market.

Moreover, consumer products are very dynamic and OEMs keep launching new models frequently unlike the periodicity of launching new telecom products/models.

Suggested Solution:

TEC can issue a one-time permanent registration Code ("OTPRC"), for a specific brand for a product category. The OTPRC can be defined as TEC-XYZ-ZZ where

XYZ - Brand

ZZ - flag for Product Category (e.g. 01 Smart Watch, 02 for Point of Sales and so on)

For example, for a Brand XYZ and Product category- Smart Watch, the OTPRC would be TEC-XYZ-01.

The proposed solution would help OEMs to print/e-label in advance to meet production planning, lead time and logistics. It is pertinent to mention that this best practice of allotting a fixed registration is also being followed by other regulators across the globe including Indian regulators like BIS and BEE.

We would earnestly request TEC to help mitigate this planning and supply chain issue. TEC may issue a suitable amendment by creating a provision on the MTCTE portal where a brand can apply for this OTPRC for a category of product in scope. We request TEC to keep in abeyance the mandate of the labelling requirement until this solution is implemented by TEC in its portal.

Looking forward to early and affirmative action in this regard.

With regards,

A handwritten signature in black ink, appearing to read "George Paul". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

George Paul
Chief Executive Officer

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

CC: Shri Ashok Kumar Mittal, Member-Services, Department of Telecommunications

CC: Shri Prasanth Kumar, DDG (MTCTE), Telecom Engineering Centre