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Ref.No.MAIT/PY/2292

August 09, 2023

Smt. Asha Nangia
Scientist G and Group Coordinator
Ministry of Electronics and IT

Sub: Request for only new models to be under the purview of incorporating USB-C charging port in notified devices from the effective implementation date

Respected Madam,

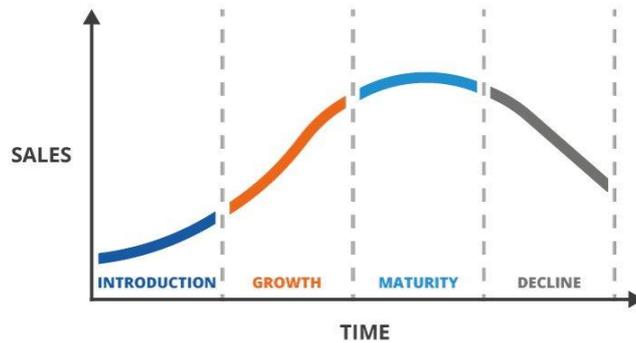
Greetings from MAIT!

This is in reference to the Common Charging Port consultations for ICT products currently being undertaken by MeitY. We appreciate your keen interest and intent in taking the industry along for the successful implementation of this initiative for the benefit of the citizens as also contributing towards the environment among others.

Through this representation, we would like to highlight one important aspect related to the subject for your kind consideration - the applicability of the notification to new products/models only. New models will be designed and produced keeping in view that any of the notified products supporting wired charging will have USB-C port(s). However, **we request that models that are already registered with BIS, may kindly be considered exempted from the notification** due to the following reasons:

- It would lead to undesired design changes which would simply not be replacing an existing non-USB-C port with a USB-C port.
- A single model having two different ports - one USB-C and another non-USB-C will affect Customer service, Supply chain and Inventory hassles.
- A product has a defined life cycle and re-design of an existing model to include USB-C will have technical and/or commercial challenges. Moreover, making a design change in the existing BIS registered models will have a huge compliance burden & repetitive effort without adding any additional safety for the consumers under CRO.
- Existing models are at different stages of the product lifecycle, Redesigning any product which have already completed its design stage or are already in the manufacturing process, will have a significant business disruption for the industry if those products now need to have USB Port C. Some are at the start of the graph, some are in the middling stage while others would be approaching the tapering section of the graph. An ICT product has a typical lifecycle of 5-7 years.

PRODUCT LIFE CYCLE



- If existing models are included to have USB-C ports, OEMs will be bound to withdraw existing models/delay the product launches leading to huge financial losses. Again, these existing models have either already been certified and registered with BIS standards or they are in the final stages of production, hence the existing models may kindly be exempted for EoDB & for smooth compliance
- Existing models will need to be continued to honour the warranty, extended warranty and AMC obligations.

We would like to draw your kind attention also to the fact that the **aspect of applicability to new models had been previously discussed in multiple meetings and agreed upon between the industry and the Department of Consumer Affairs.** This may be kindly confirmed with the Department of Consumer Affairs.

We take an opportunity to assure you that MAIT is fully supportive of introducing USB-C charging ports and we seek consideration that OEMs are not burdened with compliance of existing models that are in the market before the date of go-live of the regulation.

Warm regards,

Col Suhail Zaidi (Retd)
Director General

CC: Shri Rohit K. Singh, IAS, Secretary, Department of Consumer Affairs
CC: Shri Alkesh Kumar Sharma, IAS, Secretary, Ministry of Electronics & IT
CC: Smt. Nidhi Khare, IAS, Additional Secretary, Department of Consumer Affairs
CC: Shri Bhuvnesh Kumar, IAS, Additional Secretary, Ministry of Electronics & IT