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October 31, 2022

Shri P. K. Singh,  
Dy. Director General (Security Assurance)  
Department of Telecommunications

**Subject: Request for removing export requirements and extension in timelines for registering IMEIs of locally manufactured phones**

**References:**

1. G.S.R. 728(E) dated 26th September, 2022
2. DoT letter no 13-15/2021-UDS dated 27<sup>th</sup> Oct, 2022

Respected Sir,

***Greetings from MAIT!***

Regarding the subject mentioned above and the clarifications issued by DoT on 27<sup>th</sup> Oct 2022, we thank you for acknowledging the request for incorporating the Industry's suggestions on the portal to be developed for including the Domestic IMEI registrations as well as the Standard Operating Procedure (SOP). We are also heartened to note the assurance of the uptime of the updated system on a 24X7 basis ensuring no disruption to business.

However, we are concerned to note that the clarification on export units is contrary to the industry expectations and understanding and at the same time is not in line with the stated objectives of registering IMEIs to be sold and used in the Indian market. We fail to understand how the exported mobile devices will prevent tampering and counterfeiting of devices in India. Such a measure dampens India's thrust on exports and runs counter to the Hon'ble Prime Minister Shri Narendra Modiji's vision of making India a technological and manufacturing powerhouse. In line with the Prime Minister's vision, the Hon'ble Minister of Communications, IT and Railways, Shri Ashwani Vaishnaw has time and again spoken and taken bold policy and reformative decisions to enable Ease of Doing Business in the country.

For **mobile phones meant for export**, we would request DoT to kindly consider the following aspects:

- Registration of IMEIs is regulated by the importing country and OEMs are expected to comply with the local rules and regulations of that country.
- Registering IMEIs creates impediment to Ease of Doing Business in the country by hampering export with undue addition of rules making manufacturing in India complex. This will also create a negative image of the country to global investors.
- Countries importing mobiles may object to storing such IMEI data in other countries.
- As an international body, GSMA is handling TAC allocations on a global basis. The organisation can be approached to handle TAC/IMEI for the countries that wish to have this data.
- Allow exemptions to Brands/OEMs covered under the appropriate Customs AEO tiers not to register IMEIs for export purposes ([https://www.cbic.gov.in/htdocs-cbec/home\\_links/india-aeo-prgm](https://www.cbic.gov.in/htdocs-cbec/home_links/india-aeo-prgm))

- To give a competitive edge and strengthen “Make in India”, the Ministry of Finance has the Manufacture and Other Operations Regulations, 2019 (“**MOOWR Scheme**”). Mandatory registration of IMEIs for exports runs contrary to such initiatives to enhance and make India a manufacturing hub.

To enable the industry to comply with the new rules in letter and spirit, we would earnestly request DoT to

1. **Remove the requirement of registering the IMEIs of mobile devices meant for export.**
2. **Give at least 3 months for the rules to be effective after the SOP and portal are finalised and made ready** after industry consultations and inputs. As of date, the industry does not have a firm date as to when both SOP and the portal will be ready. **DoT may also kindly allow for at least 3 months for trial runs on a voluntary basis** to validate the system for multiple Brands/OEMs/Third party Contract Manufacturers (CM) before making the new rules mandatory.

We hope that the DoT considers the above submissions to enable the Ease of Doing Business in the country and allow the industry to work and contribute to the national agenda.

With regards,



Col. AA Jafri, Retd.  
Acting Director General – MAIT

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

CC: Dr Mahesh Shukla, Member (Services), Department of Telecommunications

CC: Shri Vijay Agrawal, Director (UDS), Department of Telecommunications, New Delhi