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March 28, 2024
ITU-APT/L/23-23/852

Shri Neeraj Mittal,
Chairman DCC & Secretary (T),
Department of Telecommunications
Ministry of Communications
Sanchar Bhawan 20,
Ashoka Road,
New Delhi 110001

Subject: Request for further extension of implementation of MTCTE

Reference: TEC Amendment Notification No. 5-2/2021-TC/TEC/185, dated 27.12.2023


Dear Sir,

We are grateful to your timely and pragmatic updates to the MTCTE scheme, which have positively impacted the compliance of the scheme. In particular, the exemptions to the End-Of-Life whole unit replacements, an increase of MTCTE certificate validity, the introduction of the simplified certification scheme, provisional certificates for highly specialized equipment, etc. have complimented the industry's intense efforts to ensure timely compliance.

Since the beginning, the aim of having MTCTE process was to have in-country certification of all the telecom equipment without hindering the growth of the telecom sector in the country. The industry is aware that labs are improving their testing abilities. However, there are still no labs for many products that can test all the parameters in one place, so each product must be sent to different labs for different tests which causes huge delays in testing or damage to the product during transportation.

Moreover, there are a limited number of TEC CAB labs available for testing RF and technical aspects of various types of wireless systems included in the Annex 1 to TEC letter No. 5-2/2021-TC/TEC/185 dated 27/12/2023. The ecosystems for testing of these products within the country is still in its early stages, and it will not be possible to test and certify all the equipment covered under MTCTE Phase 3 and 4 in a timely manner.

ITU~APT Foundation of India

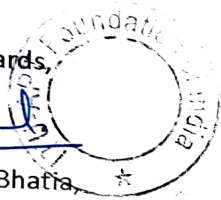
 5th Floor, 504, World Trade Center, Babar Road, New Delhi-110001, India

Considering the above, we would like to earnestly request you to kindly consider a further **extension with respect to the list of 12 products** appended in Annexure – I of above-mentioned amendment notification **for further period of one year** and till then, allow the results/test reports from ILAC accredited test labs as per the requirement.

We hope that our submission will merit your kind consideration and support and work out a way forward which is suitable for the Government as well as for industry.

Looking forward to the earliest affirmative action in this regard.

Kind Regards,



Bharat B Bhatia,
President, ITU-APT Foundation of India
Vice Chairman - Asia Pacific, World Wireless Research Forum (WWRF)
Chairman, ITU-R WP5D SWG IMT Applications
Chairman, AWG Task group on Wi-Fi and RLAN
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Copy to:

- ✓ 1. **Shri. Ajay Kumar Sahu, Member (Services), Department of Telecommunications, Sanchar Bhawan, 20, Ashoka Road, New Delhi 110 001.**
2. **Ms. Tripti Saxena, Sr DDG TEC, Telecommunication Engineering Centre (TEC), Khurshid Lal Bhawan, New Delhi 110 001.**
3. **Shri. Anand Katoch, DDG (MTCTE), Telecommunication Engineering Centre (TEC), Khurshid Lal Bhawan, New Delhi 110 001.**