



October 18th 2024

Ms Tripti Saxena
Sr DDG and Head
Telecommunication Engineering Centre
Department of Telecommunications
Khurshid Lal Bhavan, Janpath
New Delhi-110001

Dear Ms Tripti Saxena,

Sub: Request for Reconsideration: Exclusion of Mobile User Equipment from Draft ER on IP Connectable User Equipment.

Greetings from AMCHAM India, the apex American Chamber of the U.S. Industry in India. AMCHAM India is a member of the U.S. Chamber of Commerce in Washington, D.C. and the AMCHAMs of Asia Pacific. Established in 1992, AMCHAM India has over 400 U.S. companies as members.

We sincerely appreciate your ongoing support to the industry and request your consideration on the recent draft Essential Requirements (ER) on IP Connectable User Equipment shared by the Telecom Engineering Centre (TEC) on 23rd September 2024.

We recognize the significant progress made under the Mandatory Testing and Certification of Telecom Equipment (MTCTE) regime, particularly the exemption of Mobile User Equipment/Mobile handsets as per the Gazette notification S.O. 2372(E) dated 24th May, 2022. This decision has fostered growth and innovation in the mobile manufacturing sector.

The industry is encountering significant challenges with the recent inclusion of Mobile User Equipment and Mobile Tablets in the draft ER for IP Connectable User Equipment. This development could impede the deployment of advanced mobile technologies and slow India's digital progress, potentially affecting global cooperation and investment in India's tech sector.

Some key concerns are:

- **Policy consistency:** The reintroduction of mobile devices into the regulatory framework contradicts previous assurances and creates uncertainty for investors.
- **Economic implications:** Regulatory fluctuations may divert large-scale investments to countries offering more stable environments.
- **Alignment with national objectives:** The proposed ER appears to be at odds with the Hon'ble Prime Minister's calls for reducing unnecessary compliance burdens to enhance Ease of Doing Business (EoDB).

Given these challenges, **you are requested to exclude of Mobile User Equipment and Mobile Tablets from the draft ER on IP Connectable User Equipment** and maintaining the current regulatory framework that has successfully fostered growth and investment in the mobile manufacturing sector.

We would sincerely appreciate your consideration of the industry concerns and request a stakeholder's interaction at a time convenient to you.

We look forward to your response and remain available for any further discussions or clarifications.



Ranjana Khanna

Director General CEO

American Chamber of Commerce in India

PHD House, 4th Floor, 4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110 016

Tel : +91 11 2654 1200; 4650 9413 | DID: +91 11 4650 9414

Cell: +91 81307 16604; +91 88263 36604 ;+1 202 957 1250, Fax: +91-11-2654 1222

Email: ranjana.khanna@amchamindia.com | Website: www.amchamindia.com