![DIGITALEUROPE]

BRUSSELS, 17 July 2015

Secretary
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Ministry of Communications & Information Technology (Government of India)
Electronics Niketan, 6, CGO Complex,
Lodhi Road,
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Dr. Ajay Kumar
Joint Secretary
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Director General,
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DIGITALEUROPE response on India Implementation timing of Indian plug pin dimensions as per IS 1293

DIGITALEUROPE would like to raise some views and suggestions on the recent notification of 22nd April 2015 where Industry is required to comply with IS1293 for dimensions and configuration of pins of plugs in adaptors and chord sets, by 13th August, 2015 with respect to the BIS CRO by the Department of Electronics & Information Technology, Government of India.

While the industry appreciates and respects the efforts made by the DeitY and BIS to have all mains electrical products meet the Indian standards, we request Deity and BIS to allow Industry sufficient time to react to decisions mandating requirements of such significant nature. This requirement was unexpectedly announced, prompting a redesign of all power adapters to meet this requirement, where previously all EU two pin plugs were accepted without issue or safety concern on Class II products.

The implementation timing that has been announced is not within a feasible design cycle for a power adapter to comply with Indian plug dimensions and configuration.

The typical design cycle for a power adapter to meet the pin size spacing and plug dimensions as per Indian Standard IS1239 and to meet all the technical criteria, for example for touch screen mobile phones and tablets, is usually 9-12 months. It comprises typically the following cycle steps: internal approval - tooling – mould design – engineering prototyping - safety testing – reliability testing – quality approval - internal approval and validation - pilot lot Run – sign off to build – material shipments – QA & testing – certification and Ready for Production. At the end of this cycle there is a considerable time to ramp for production volumes. This can take an additional period of time, typically 2-3 months. These timelines are all magnified when there are multiple power adapters requiring redesign to Indian plug

standard IS1392 for different product lines within one manufacturer's portfolio. By expediting these timelines it has a potential to lead to compromises in the design and quality of the product.

We are in support of your requirement of Plug Pins dimensions to comply with IS 1293 and assure you that all the efforts are being put in place to soonest comply with it. By allowing additional time we can be confident to have a compliant power adapter with the Indian plug standard IS1392 to safely service the Indian market.

However, in view of the above information, we request your considerations to grant an extension of the due date from 13th August, 2015 to 12th March, 2016, to allow the required time to comply with the Plug Pin requirements.

Thank you for your consideration of these comments.

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ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 59 corporate members and 36 national trade associations from across Europe. Our website provides further information on our recent news and activities: http://www.digitaleurope.org

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