

This paper has been prepared to seek comments of all relevant stakeholders regarding implementation of Regulatory Administrative fee w.r.t processing and issuance of Certificate of Compliance (CoC) plus review of the existing Type Approval fee structure. Moreover, feedback on improvement of the existing processes regarding Type Approval & Issuance of CoC is requested, preferably through email or postal address, within three weeks of the publication of this paper.

Consultation Paper on Implementation of Administrative Charges/Fee w.r.t Issuance of COC & Type Approval certificate v2.0

**DIRECTOR TYPE APPROVAL (PTA HQs, F-5/1,
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Consultation Chronology: PTA started consultation on the subject matter by sharing an initial consultation paper on April 2, 2024, seeking comments from relevant stakeholders, required to be submitted by April 22, 2024. Only few comments were received from stakeholders in this regard. Furthermore, Mobile Device Manufacturers (MDMs), via PMPMA's letters (dated April 22, 2024), requested PTA to convene a meeting for deliberation on the proposed administrative fee/charges. Subsequently, PTA held a consultation session with MDMs on May 14, 2024. Following this session, few updates are made in section 3.0 of this consultation paper (version 2.0).

1. Background

1.1 Pakistan Telecommunication Authority, PTA (the “**Authority**”) is mandated to regulate the establishment, operation and maintenance of telecommunication system and the provision of the telecommunication services in Pakistan. The Authority under section 5 (2) (g) of the Pakistan Telecommunication (Re-organization) Act, 1996 (the “**Act**”) is empowered to prescribe standards for telecommunication equipment and terminal equipment, certify compliance of such equipment with prescribed standards, and issue approvals of terminal equipment and of approved installers under section 29. The Authority under section 5 (2) (o) read with section 29 of the Act is empowered to issue regulations for exercising its powers and performance of its functions and specify standards for terminal equipment and certify that it complies with the relevant technical standards that no person should install any telecommunication equipment as part of, or connect terminal equipment (other than a plug into-socket connection) to any public switched network except in accordance with regulations made by the Authority.

1.2 Accordingly, the Authority issued the Type Approval Technical Standards Regulations, 2021 and Mobile Device Identification, Registration and Blocking Regulations, 2017.

1.2.1 Type Approval Technical Standards Regulations, 2021

Under Regulation 12 of the Type Approval Technical Standards Regulations, 2021, an applicant seeking a Certificate of Compliance to Technical Standards (CoC) for below mentioned terminal equipment type shall submit their application through the Device Identification, Registration, and Blocking System (DIRBS) or any alternative method formally prescribed by the Pakistan Telecommunication Authority (PTA).

- (a) For SIM/IMEI based terminal equipment /Mobile Device;
- (b) For non-SIM/IMEI based Wireless Terminal Equipment device; and
- (c) For SIM/IMEI based Terminal mobile device imported by a person for personal use.

1.2.2. Mobile Device Identification, Registration and Blocking Regulations, 2017

A compliant mobile device, means a device that:

- (a) Has a valid IMEI assigned by GSMA;
- (b) Device with unique IMEI;
- (c) Device that is not stolen/lost; and
- (d) Type Approved Device or/having Certification of compliance issued by the Authority.

1.3 Under regulation 23(h) & 23(l) of Pakistan Telecommunication Authority (Functions & Powers) Regulations, 2006 the Authority may levy and charge fee for Type Approval and any other fee for any authorization granted under the Act and for the purpose of the Act such as, administration of license, approval for extension of the service / system etc. as may be specified by the Authority.

1.4 At present, there is no application/ processing administrative fee being charged by PTA to applicants for processing and issuance of Certificate of Compliance (CoC) there is a dire need to impose such administrative/regulatory/applications processing fees in order to cater for the regulatory overheads such as the expenses associated with the allocation of human resources, handling paperwork, dispatching Certificates of Compliance (COCs) to the applicants, correspondence with multiple entities, payment of the GSMA TAC database subscription fee(s) and above all the administrative cost associated with the operation and maintenance of DIRBS platform. Imposition of such regulatory administrative fee(s) would reduce a significant financial burden on PTA. In this backdrop, with a view to maintain quality and to further improve efficiency of our COC issuance process, it is imperative to meet all such expenses to the best possible extent.

1.5 The major cases being processed by Type Approval Directorate for processing and issuance of COC are listed below

- a. Commercial CoC i.e., CoC for already Type Approved SIM/ IMEI based devices imported in CBU form by commercial importers
 - b. CoC for mobile phones in SKD/CKD form imported by Mobile Device Manufacturing (MDM) Authorization holders for manufacturing in Pakistan.
 - c. CoC for finished mobile phones manufactured by Mobile Device Manufacturers.
 - d. CoC for registration of mobile phones in individual category.
 - e. CoC for the non-SIM based terminal/ telecom equipment.
2. Type Approval Department has over time witnessed significant increase in the number of requests for the above mentioned services. These requests have added significant administrative cost on PTA and demand is ever increasing. In order to address the demand and to be able to serve efficiently and timely it is essential to address the associated expenditure so as to ensure smooth provision of such services.

3. New/Revised Regulatory Administrative Fee

CoC application processing administrative fee will be applicable for commercial Completely Built Units (CBUs), Non SIM based Terminal/ Telecom equipment and Commercial CoC for MDM SKD/ CKD parts applications submitted to PTA.

COC Type	Fix Fee(PKR)	Variable Fee (PKR)	Total
Commercial CBU	5,000	400 x No. of Units	Fix + Variable
MDM (Parts Import)	-	*For every 1,000 devices, an application fee will be charged @ 70,000/-. However, if the number of devices exceeds the count of 1,000 devices then additional fee of 70,000/- shall be charged for each subsequent lot of 1,000 devices.	Variable (Per Application)
Commercial CoC for Non SIM Terminal/ Telecom Equipment	2,500	400 x No. of Units	Fix + Variable

***Please note that the above fee for MDM is based on the number applications i.e. PKR 70k per application for 1000 units, however, if the units per application are increased from 1000 to 2000 then the application fee will be doubled and same would go on for additional 1000 slab.**

Revised fee structure for Type Approval (Terminal equipment)

Following revised fee structure for application Processing Fee (Non-Refundable) and Type Approval certificate fee separately.

S. No.	Type Approval Equipment Categories	Current	Revised Fee
1	Processing Fee	100\$	200\$
2	Type Approval certificate fee	100\$	200\$
3	Short Range Devices (SRD) & Terrestrial Internet of Things (IoT) Services etc. (Processing fee+ Certificate Fee)	50\$+50\$	100\$+100\$