

aDesign, Manufacture, Supply, and Fixing of High Security Registration Plates in vehicles in Tamil Nadu

Tender Ref No. 33432/HB2/2019

Clarification for Bidders

Based on the representations made by prospective bidders in the pre-bid meeting and various representations received vide email, clarifications on the Notice Inviting Tender document is provided as below.

S No.	Page No.	Clause No.	Clause	Query Raised	Clarification/ Reply
1	10	1.1.3	The Bidder Company/ Technical Member in the case of Consortium shall own a HSRP manufacturing unit in India with minimum monthly production capacity of 5 (Five) lakh HSRP .	<p>Query 1: The pre-eligibility criteria stated in clause 1.1.3. Magnifies the fallacy of the entire technical specifications, in as much as, on one hand the tendering authority has stated in clause 1.1.4. that the bidder ought to have executed High Security Registration Plate projects for at least 5 whole State/ Union Territories in India while on the other hand stating that in the case of Consortium they shall own a HSRP manufacturing unit in India with minimum monthly production capacity of a mere 5 Lakh HSRP, which cannot under any circumstances be practically viable for a company executing such works in 5 States or Union Territories and thus gives it the appearance that this entire tendering process has been tailor made keeping in mind just a few bidders. This contradiction is further highlighted in clause 1.1.4 of the bid document.</p> <p>Query 2: 1) Experience in 5 States The IFBs issued in 2011 and 2016 were with experience in two states. It is a well – known fact that only a handful of states have finalized the contracts in the last four years. Also, ever since the MoRTH amended procedure of affixation of HSRPs through OEM route, no state has finalized a contract for full/whole state. Then how come the requirement has suddenly gone up from experience in two states to five states in not understood. Moreover, the IFB issued in 2011 was for division of the state in two parts which was subsequently withdrawn and the bid was for the entire state. Also, the IFB issued in 2016 was for the whole state. Now, in 2021, what was amended in 2011 and continued in 2016, has been brought back. Not understood. Moreover, the IFB states experience in 5 WHOLE states. Does that mean that the successful bidders will not be able to put your state experience, this is presuming that the division of state is not amended in the IFB.</p> <p>Query 3: The pre-eligibility criteria stated in clause 1.1.3. Magnifies the fallacy of the entire technical specifications, in as much as, on</p>	<p>That the capacity of Production HSRP sought is to confirm and select a technically sound vendor.</p> <p>The said requirement is calculated on the basis of monthly requirement.</p> <p>Tender conditions shall prevail.</p>

				<p>One hand the tendering authority has stated in clause 1.1.4. That the bidder ought to have executed high security registration plate projects for at least 5 whole states/union Territories in India while on the other hand stating that in the case of consortium they shall own a HSRP manufacturing unit in India with minimum monthly production capacity of mere 5 Lakh HSRP, which cannot under any circumstances be practically viable for a company executing such works in 5 states or union Territories and thus gives it the appearance that this entire tendering process has been tailor made keeping in mind just a few bidders. This contradiction is further highlighted in 1.1.4 of the bid document.</p>	
2	10	1.1.4.	<p>The Bidder Company/ Technical Member in the case of Consortium must have Technical Experience in executing/executed High Security Registration Plate Project for at least 5 whole States/ Union Territories in India for a minimum period of one year, as on the date of submission of the Bid. The scope of such contract should be for implementing HSRP in all RTO's / UO's of the respective State / Union Territory.</p>	<p>Query 1: The Bidder Company/ Technical Member in the case of Consortium must have Technical Experience in executing/executed High Security Registration Plate Project for at one whole States/ Union Territories in India for a minimum period of 5 Years, as on the date of submission of the Bid. The scope of such contract should be for implementing HSRP in all RTO's / UO's of the respective State / Union Territory.</p> <p>Query 2: This in our humble submission, is totally unwarranted, in as much as, any company executing such works in any other State of the country would have the similar or even better technical and financial qualifications and hence ought to be eligible to fairly contest in participating in the tender process. The ultimate choice of selecting the best bidder, no doubt, rests with the State Government. Such tender conditions not only impede healthy competition but also creates artificial barriers in the market for young manufacturers as any bidder which have a valid TAC, having sufficient manufacturing capacity and having an experience of implementing such works in less than 5 States is being barred from competing in the tender process. Further, the IFB issued in Mar 2016 by the Tamil Nadu Transport Department that now stands scrapped had asked for experience in two states. It is not understood as to how the requirement of two states has been increased to five states when after the G.O. of MORTH in 2018 and 2019 no state government has issued any tender as the OEM model has come into effect. Moreover, one year makes no sense as NO order of any State Government had been finalized in the past three years. Thus, the 5 State experience clause needs to be dropped immediately.</p> <p>Query 3: (i) The aforementioned pre-eligibility criteria in Clause 1.1.4 which requires the bidder to have experience of implementing HSRP project in 5 whole States/UTs shall be a bar for such manufacturers who otherwise have requisite turnover and technical capabilities to undertake the successful implementation of the HSRP Policy and have been diligently manufacturing HSRP Project in 1, but less than 5 States. Such tender conditions shall create barriers in the market for these manufacturers. Who is technically competent, financially worthy and have sufficient experience of</p>	<p>1.The IFB is as per Ministry of Road Transport and Highways NIT guideline dated 06.03.2002.</p> <p>2. The experience sought is as per the below judgments passed by the Hon'ble Supreme Court of India. <u>Judgment dated 30th November 2004 reported as (2005) 1 SCC 679 in W.P (c) No. 41 of 2003 (page 27-28). Para 3rd, Page 27</u> <i>"Keeping in view the enormous work involved in switching over to new plates within two years for existing vehicles of such large numbers in each State, resort to 'trial and error' method would prove hazardous. Its concern to get the right and most competent person cannot be questioned. It has to eliminate manufacturers who have developed recently just to enter into the new field. The insistence of the State to search for an experienced manufacturer with sound financial and technical capacity cannot be misunderstood. The relevant terms and conditions quoted above are so formulated to enable the State to adjudge the capability of a particular tenderer who can provide a fail-safe and sustainable delivery capacity. Only such tenderer has to be selected who can take responsibility for marketing, servicing and</i></p>

			<p>even experience of successful implementation even in one State/UT will be serve the same objective as any bidder having experience in 5 States/UTs. Significantly, has an experience of implementing in one States /UT is competent enough to participate. Thus, such arbitrary requirement of mandatory implementation in 5 States has no nexus with the objective of HSRP Policy implementation and will only curtail competition and allow only three out of eight experienced manufacturers to participate. Given below is a list of HSRP MANUFACTURER who has experience of working in at least on state but does not have experience of working in 5 states</p> <p>Query 4: This includes catering to the existing contracts. With 277 lac vehicles till .31 March 2019 as per Annexure XVI, and with the MoRTH's mandate to complete the affixation on old vehicles in two years, per year the requirement is 135 lacs which is 12 lacs per month. How can the contractor fullfull its commitments in the existing 5 states + Tamil Nadu with a manufacturing capacity of 5 lacs plates per month, is not clear. The manufacturing capacity should be at least 25 lacs plates per month to do justice.</p> <p>Query 5: The aforementioned pre- eligibility criteria in Clause 1.1.4 which requires the bidder to have experience of implementing HSRP project in 5 whole States/UTs shall be a bar for such manufacturers who otherwise have requisite turnover and technical capabilities to undertake the successful implementation of the HSRP Policy and have been diligently manufacturing HSRP Project in 1, but less than 5 States. Such tender conditions shall create barriers in the market for these manufacturers. Who is technically competent, financially worthy and have sufficient experience of even experience of successful implementation even in one State/UT will be serve the same objective as any bidder having experience in 5 States/UTs. Significantly, has an experience of implementing in one States /UT is competent enough to participate. Thus, such arbitrary requirement of mandatory implementation in 5 States has no nexus with the objective of HSRP Policy implementation and will only curtail competition and allow only three out of eight experienced manufacturers to participate. Given below is a list of HSRP MANUFACTURER who has experience of working in at least on state but does not have experience of working in 5 states:</p> <ul style="list-style-type: none"> (I) Celex Technologies Pvt Ltd (II) Promuk Hoffmann International LTD (III) Ackruti Safeguard Systems Pvt. Ltd., (IV) FTA HSRP Solutions Pvt Ltd., (V) AgrosImpex (I) Pvt. Ltd (VI) Tonnjes Eastern Security Technologies Pvt Ltd., <p>Pertinently, owing to aforementioned impugned clauses, the aforementioned HSRP manufacturers will be ousted from participating from, the tender process and it would only allow participation of 3 HSRP manufacturers.</p> <p>(ii) It is pertinently, owing to aforementioned impugned clauses, would perfectly fit only certain three manufacturers, all of which have seemingly formed a cartel for winning this bid at a much higher</p>	<p><i>providing continuously the specified plates for vehicles in large number firstly in initial two years and annually in the next 13 years. The manufacturer chosen would, in fact, be a sort of an agent or medium of the RTOs concerned for fulfillment of the statutory obligations on them of providing high security plates to vehicles in accordance with rule 50. Capacity and capability are two most relevant criteria for framing suitable conditions of any Notices Inviting Tenders</i></p> <p>Judgment dated 13.07.2016 passed in C.P(C) 483 OF 2013.</p> <p><i>The State Governments shall ensure selection and authorisation only of those TAC manufactures who have been financially and technically competent to manufacture and supply the requisite number of HSRP in the State.</i></p> <p>Tender conditions shall prevail.</p>
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3	10	1.1.5	The Bidder and in case of consortium the technical member must have manufactured, supplied and affixed at least 5Lakhs HSRPs on Motor Vehicles for State Transport department in India in the last three financial year.	<p>Query 1: Request for amendment by limiting the Quantity manufactured, supplied & affixed to 4 lakhs instead of 5 Lakhs on Motor Vehicles for any Transport Department in India during the Last EIGHT years</p> <p>Query 2: The above mentioned clause against smacks of biasness, in as much as, the tendering authority is seeking to blow hot and cold air at the same time. While on the one had, stating that the bidding consortium requires an experience of executing such works in at least 5 States or Union Territories while on the other hand stating that the consortium must have manufactured, supplied, and affixed a mere 5 Lakh High Security Registration Plates which does not add up at all. Hence this proves our contention that the tendering criteria have been tailor made to suit just a handful of bidders who have been operating in 5 smaller States of India. While such companies do not have the experience of fixing High Security Number Plates on a huge quantity of vehicles which is desired in the State of fTamil Nadu, such conditions are being created to selectively accommodate these companies in the bidding process.</p> <p>Query 3: The Bidder and in case of consortium the technical member must have manufacture. Supplied and affixed at least 5 Lacs HSRPs on Motor Vehicles for State Transport Department in India in the last three financial years.”</p> <p>Query 4: <u>1.1.5 Experience of 5 lac plates in 3 years.</u> Experience of 5 lacs plates in 3 years is miniscale requirement. One is talking in terms of 5 states experience which means 1.6 Lac plates per state in three years, which breaks down to 50 thousand plates in one year, meaning less than 4500 plates in a month.</p> <p>Which 277 lac vehicles registered till 31 March 2019, the successful bidder will have to cater to 135 lac plates per year, as within two years the old vehicles will have to be affixed, as per the MoRTH guidelines. This means one is talking in terms of over 10 Lacs vehicles to be affixation per month, by a company which has experience of less than 4500plates per months.</p> <p>The five state experience should be done away with. Any company having an experience of 100 lac plates in the last three years, should only be considered.</p>	<p>Please refer the clarification provider in Sl. No. 2.</p> <p>Tender conditions shall prevail.</p>

				<p>Query 5: Can We submit a Chartered Accountant Certificate with regard to the requirement as sought under clause 1.1.5 (5 lakhs HSRP plates to the Transport Department in last 3 years)?</p> <p>Query 6:</p> <p>(i) It is also significant to highlight that the IFB eligibility criteria does not appear to be uniform enough to ensure that all technically competent bidders are able to participate in the bidding process. Concern is raised regarding the Clause 1.1.5 which States the following, “The bidder and in case of consortium the technical member must have manufactured, supplied and affixed at least 5 lacs HSRPs on Motor Vehicles for State Transport Department in India in the last three financial years”. Firstly, pre-eligibility criteria of requiring bidders to have manufactured only 5 Lac HSRPs in the last three years is too less a requirement for selecting a bidder which is expected to execute HSRP Project for the State of Tamil Nadu, requiring production of HSRPs up to 1.38 Crore HSRP per Zone.</p> <p>(ii) Secondly, Pre-eligibility criteria are not uniform, on one hand Clause 1.1.14 and 1.1.6 require bidders to have experience in experience of executing HSRP contracts in 5 States / UTs and to have completed 10 COPs, when one COP alone requires at least production of 15 Lacs number plates and on the other hand under Clause 1.1, IFB is only seeking minimum production 5 Lac number plates in the last three financial years. Thus, the pre-eligibility conditions are arbitrary and not well contemplated. Thirdly, the clause only need experience of manufacturing/supplying of 5 Lac HSRPs only to State Transport Department, and not considering the experience of supply of HSRP to OEMs.</p> <p>(iii) Thirdly, Clause 1.15 would lead to participation of HSRP suppliers who have experience in 5 small States/ UTs but do not have much wherewithal of producing HSRP in larger volumes.</p> <p>Query 7: The abovementioned clause again smacks Of biasness, in as much as, the tendering authority is seeking to blow hot and cold air at the same time. While on the one hand, stating that the bidding consortium requires an experience of executing such works in at least 5 states or union territories while on the other hand stating that the consortium must have manufactured, supplied, and affixed a mere 5 lakh High security registration plates(HSRP)which does not add up at all. Hence this proves our contention that the tendering criteria have been tailor made to suit just a handful of bidders who have been operating in 5 smaller states of India. While such companies do nothave the experience of fixing high security registration plates (HSRP) on a huge quantity of vehicles which is desired in the state of tamilnadu, such conditions are being created to selectively accommodate these companies in the bidding process.</p>	
4	10	1.1.6	The Bidder Company Technical Member (in case of Consortium)	Query 1:	That the COP Cycles and its certification from the Notified Testing agencies confirms that

			shall possess a valid Conformity of Production(COP) Certificate on the date of submission of the Bid and must have completed minimum Ten (10) Conformity of Production (COP) cycles.	Request for amendment “By reducing the CoP cycles to minimum 4 cycles instead of 10	the technical member has a rich experience of commercial production and supply of HSRPs to various states and is in the field of HSRP implementation since many years as per the mandate of COP norms /guideline and AIS 159 as specified by Ministry of Road Transport and Highways. Tender conditions shall prevail.
5	11	1.1.7	The Bidder Company or any of its shareholder or directors, members in case of Consortium should not have been involved in any type of financial irregularities with any financial institutions or banks or have been declared as Non-Performing Assets (NPA). An affidavit to this effect shall be submitted as shown in Annexure XXII.	<p>Query 1: Clause please be Deleted.</p> <p>Query 2: The pre – eligibility criteria in clause 1.1.7 is again totally arbitrary and based as it requires the shareholders of a company (who are not even a direct part of a company) and have no hand in the operations of a company to not have any type of a financial institutions or banks or have been declared as Non-performing Assets (NPA)</p> <p>Though the concern of the authorities to identify bidders who are of sound credibility is justified, the same should be restricted to the bidder and its Directors itself. A company can have many shareholders and an individual can have many shareholders and anshare holding in as many companies as he or she desires, without having any sort of a role or responsibilities or direct involvement into the day – to – day affairs of any of the companies of which he or she is a shareholder.</p> <p>This way, no public limited companies will be eligible to bid as in most cases, there are lacs and lacks of shareholders, no company can give such an affidavit.</p> <p>Therefore, the clause in its current form seems to be irrational with the inclusion of sdthe word ‘shareholder’ and it seems to be a blatant attempt on part of the companies favoring whom, the bid document has been drafted in its current form.</p> <p>Therefore, it is our humble submission that this clause along with the aforementioned clauses of the eligibility criteria ought to be immediately repealed along with the others.</p> <p>Further, if a Company of good standing must be selected by the Govt. of Tamil Nadu, those companies whose HSRP contracts have previously been suspended or/ and terminated by any State Government, or/and their Type Approval Certificates or their COPs have been suspended by any of the issuing authorities, should be barred from participating in the tender process. As of now, no such clause exists in the tender document which is once again a blatant giveaway that the tender document has been prepared to favour a handful of companies which would otherwise not be eligible to</p>	<p>That the project of High Security Registration Plates is related to National Safety and security, therefore the company that shall will be implementing the HSRP project should have good past track record and the company implementing the project should not be involved in any financial irregularities.</p> <p>It is the duty of the company /the vendor to ensure that its associated shareholder or directors, members are not be involved in any such activities related to financial frauds.</p> <p>Tender conditions shall prevail.</p>

			<p>participate in the tender bed on their past indiscretions.</p> <p>Query 3: This requirement of affidavit in Annexure XXII is irrelevant as this does not make any sense. How can a Public limited company having lacs of shareholders, who have no say in the management of the company in any way, give such an affidavit on behalf of the lacs of its shareholders. When Annexure XXI is being provided as per the MoRTH gazette notification of 12 June 2012, where is the need of such an affidavit as asked for in Annexure XXII. Moreover, the requirement of a certificate of a certificate from the Bidder that they have not been debarred or have had their contracts terminated is found missing in this IFB, which was there in the earlier IFBs of 2011 and 2016. If the Bidder company / Joint Venture / any member of the Consortium had been involved in sub-contracting/ assigning the job work/ Outsourcing Activities, have abandoned nor rescinded in HSRP project in any State / Union Territory in India or abroad, subsequent to the Gazette Notification S.O.2091 (E), DATED: 16.09.2011, THEIR Bid shall be summarily rejected. Moreover, a certificate should be taken that the bidder has not defaulted in depositing the EMD after issue of LOI. This will ensure that only genuine bidders participate and don not back out, after the issue of LOI, thus wasting the precious time of the Government and other bidders. Such a certificate will ensure only genuine bidders participate in the bidding process.</p> <p>Query 4: The pre-eligibility criteria in clause 1.1.7. is again totally arbitrary and niased as it requires the shareholders of a company (who are not even a direct part of a company) and have no hand in the operations of a company to have any type of financial irregularities with any financial institution s or banks or have been declared as Non-performing Assets (NPA).</p> <p>Though the concern of the authorities to identify bidders who are of sound credibility is justified, the same should be restricted to the bidder and its Directors itself. A company can have many shareholders and an individual can haver shareholding in as many companies as he or she desires, without having any sort of a role or responsibilities or direct involvement into the day-to-day affairs of any of the companies of which he or she is shareholder.</p> <p>This way, no public limited companies will be eligible to bid as in most cases, there are lacs and lacs of shareholders, no company can give such an affidavit.</p> <p>Therefore, the clause in its current form seems to be irrational with the inclusion of the word 'shareholder' and it seems to be a blatant Attempt on part of the companies favoring whom, the bid document has been drafted in its current form.</p> <p>Therefore, it is our humble submission that this clause along with</p>	
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6	11	1.2.1	<p>Bidder or consortium members together must have total average annual turnover of Rs. 40 Crores in the last three financial years out of which the Bidder or the technical member in case of Consortium should have minimum average turnover of Rs 5 Crores from HSRP business in the last three financial year. (2017-2018,2018-2019,2019-2020)Chartered Accountant certified Balance sheets shall be provided.</p>	<p>Query 1: Bidder or consortium members together must have total average annual turnover of Rs. 40 Crores in the last three financial years out of which the Bidder or the technical member in case of Consortium should have minimum Cumulative turnover of Rs 2 Crores from HSRP business in the last three financial year. (2017-2018,2018-2019,2019-2020) Chartered Accountant certified Balance sheets shall be provided.</p> <p>Query 2: Clause 1.2.1 requires the bidder or the technical member in case of consortium to have a minimum average turnover of Rs. 5 Crores from HSRP business in the last three financial year. (2017-18, 2018-19, 2019-20).</p> <p>Once again, this clause seems to have been drafted without the application of logic or mind. The contract for Tamil Nadu HSRP will require the implementing company(s) to execute work orders in the range of Rs. 50 to Rs. 100 Crores per annum from HSRP business based on the timeline stipulated in the tender.</p> <p>Counterintuitively, the bar that has been set to select an able and experienced vendor has been kept as low as Rs. 5 cr. Per annum, whereas companies which have the desirous turnover of Rs. 50 to Rs. 100 Crores per annum from HSRP business alone and therefore are a better qualified to implement the project, have been deliberately barred from participating in the tendering process, by putting up artificial entry barriers such as those highlighted above.</p> <p>Query 3: It is humbly submitted to your offices that the abovementioned eligibility criteria of 1.1.4 and .2.1 are based on extraneous considerations that would result into disallowing competent HSRP manufacturers which is in business of manufacturing and selling HSRP since last 10 years and has successfully implemented HSRP Project in one out of two zones in the state of West Bengal, is technically competent and financially worthy, and currently also supplying HSRP to more than a 100 OEMs in India for implementation of HSRP in new vehicles in PAN India ; and on the other hand, clause 1.1.5 would lead to participation of HSRP suppliers who have experience in 5 small states/UTs but</p>	<p>The said financial conditions shall enable the Government of Tamil Nadu to select financial sound vendor and not just fly by night operator.</p> <p><u>As per Judgment dated 30th November 2004 reported as (2005) 1 SCC 679 in W.P (c) No. 41 of 2003</u></p> <p><i>“It is submitted that the main objective of the competitive bidder process was to ensure that such manufacturers as selected by the State would be able to comply with the requirements of rule 50. In selecting a suitable manufacturer, his capability and capacity to invest and build necessary infrastructure, has to be assessed so that through him, the scheme becomes operationable from the targeted date 28.2.2003 and without any difficulty it remains so operational for a longer period so that all existing vehicles switch over to high security registration plates as also the newly purchased vehicles are fitted with such plates. The tender conditions are deliberately so framed as to eliminate newly floated companies commonly described as 'fly by night companies' which merely compete to obtain the contract but have neither technical nor financial capacity to fulfil the contract of such vast dimensions.</i></p>

			<p>do not have much wherewithal of producing HSRP in lager volumes Hence, the aforementioned eligibility criteria are anti-competitive, tailor-made, discriminatory and based on extraneous considerations.</p> <p>The aforementioned eligibility criteria are discriminatory, arbitrary and anti- competitive, have no nexus with the objective of HSRP Policy and restrics many competent and otherwise eligible HSRP manufactures to even participate in the Tender Process initiated by Your Good Offices, which is manifested as hereunder</p> <p>Query 4: The average price of each HSRP if taken as Rs. 500, with 277 lac vehicles registered till 31March 2019, the contractor will have to affix 138 Lac HSRP in one year. Means a turnover of 500 x 138= 69,000 Lacs or Rs. 69 Crores. How can a company having a turnover of 5 crores expected to justify a works contract of 69 crores? The experience should be at least 50% of the expected turnover of 69 crores i.e. 35 crores.</p> <p>Query 5: With respect to Clause 1.2.1, it is submitted that the said caluse needs to be amended to allow wider participation of technically and financially competent HSRP manufacturers. Significantly owning to change in Rule 50 of CMVR with effect from 01.04.2019 and the prevalence of COVID in 2020, the business of HSRP has been impacted, thus, the insistence of the said clause in its present form requiring average of 40 crores turnover for teh last 3 years and average of 5 Crores from HSRP business from the last three financial years, will oust otherwise financially capable bidders. For instance, M/s. Celex’s turnover was more than 65 Crores in 2019-20. And although it is more than Rs. 40 Crore, going by the present clause, it would made M/s. Celex ineligible because the conditions ask for average turnover of Rs. 40 Crores in the last 3years.n In lieu of the same, the clause could be amended in the following manner, “Bidder or consortium members together must have total annual turnover of Rs. 40 Crores in any one of the last three financial yea4rs out of which the Bidder or the Technical member in case of Consortium should have minimum turnover of Rs. 5 Crores from HSRP business in any of the last three financial years (2017-18, 2018-19, 2019-20)”. Significantly the Clause 1.2.1 in its present form will favour only few manufacturers who have major market access or are in dominant position.</p> <p>Query 6: Once again, this clause seems to have been drafted without the application of logic or mind. The contract for Tamil Nadu HSRP will require the implementing company(s) to execute work orders in the range of Rs 50-Rs 100 crores per annum from HSRP business based on the timeline stipulated in the tender.</p> <p>Counter intuitively, the bar that has been set to select an able and experienced vendor has been kept as low as 5 Cr per annum, whereas companies which have the desirous turnover of Rs 50-Rs 100 cr</p>	<p>Tender conditions shall prevail.</p>
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7	13	1.6.1	The Bidder shall furnish, as part of his bid, an Earnest Money Deposit for the amount of Rs.50 lakhs (Rupees Fifty lakhs only) as mentioned in "Invitation for Bids".	Query 1: Request for amendment "The Bidder shall furnish as part of his bid, an EMD for the amount of Rs.20 lakhs (Rupees Twenty Lakhs Only) in the form of as mentioned in the IFB.	The EMD amount has been sought keeping in mind the project value. Tender conditions shall prevail.
8	13	2.1.1	The Transport Commissioner invites Bids for selecting a bidder to create infrastructure and supplying of High Security Registration Plates to Vehicle registered prior to 01.04.2019 in the entire State of Tamil Nadu in conformity with the Rule 50, of the Central Motor Vehicles Rules, 1989, HSRP Order 2018 , S.O No. 1018 (E) dated 25.02.2019 , G.SR No. 749(E) dated 07.08.2019, G.S.R No. 104(E) dated 11.02.2020, S.O 1759 dated 05.06.2020 and as amended from time to time by the Ministry of Road Transport & Highways, Government of India from time to time.	That the Authority is requested to issue series wise/PHASE wise conversion plan, post award of the integrated can be contract, so that necessary infrasaturcre the load in in created to cater the load in an effective manner.	Tender conditions shall prevail.
9	14	2.1.2	The successful bidder shall set up, install, operate and establish complete infrastructure in all respects for fixing of HSRP within 60 days from the date of award of contract as per clause 5 and shall submit an undertaking to this effect in Section VII. High Security Registration Plates and the 3rd Registration mark in the form of self-destructive type	Query 1: 1. We would like to seek the clarification that how this is going to be met with in 2 years? As the existing vehicle owner may take his own time to replace with new HSRP. 2. Can we get an assurance from the Department that the scheme is strictly implemented with time bound limits, if not an excess of amount may please be allowed to collect from the vehicle user beyond 2 years of Implementation. Query 2: Under Clause 2.1.2 it has been mentioned that the Transport Commissioner may give directions about the colour or additional information which should be printed on the 34d Registration Plate to the bidder from time to time.	That the conversion of old vehicles shall be within two years and importantly as per the schedule/calendar that shall be provided by the Transport department, Govt. Of Tamil Nadu. Response to Query 2: The below word to be

			<p>shall be issued and fixed in the manner prescribed in Govt. of India notification on vehicles at the premises of the Registering Authorities.</p> <p>The Transport Commissioner may give directions about the colour or additional information which should be printed on the 3rd Registration Plate to the bidder from time to time. It will be mandatory for the existing registered vehicles, to replace the existing number plates with new High Security Registration Plates, within 2 years of launch of this scheme.</p>	<p>Under clause 6.6 samples has been asked to be certified by the testing agency and to be submitted in all the RTOs</p> <p>We request to amend the said requirement of certifying from the testing agency as the samples that shall be submitted to your good office are already covered under Conformity of Production (COP) audit being done by the testing agencies as per AIS.</p> <p>Also we request your office to ask for the samples submission at the Transport Commissioner office post award of the contract.</p> <p>That the total number of vehicular population registered prior to 01.04.2019 has been unevenly bifurcated into two Zones i.e. Zone – A and Zone – B. We request the authority to divide the zones equally.</p>	<p>considered as deleted.</p> <p><i>The Transport Commissioner may give directions about the colour or additional information which should be printed on the 3rd Registration Plate to the bidder from time to time.</i></p> <p>The same shall be provided only post award of the contract but before implementation.</p> <p>The same is deleted as the HSRP should be in accordance to the Rule 50 of CMVR 1989 and HSRP Order 2018.</p> <p>The vehicle population registered prior to 01.04.2019 has been listed as two zones only on tentative basis. On the date of award of contract the number of RTO/ UO locations prevailing at that time shall be bifurcated into Zone A and B equally.</p>
10	15	4.2.1	<p>The bidder should also invariably give the details of “ON LINE” management system and access method relating to the issuance of High Security Registration Plates.</p>	<p>Query 1: If our understanding is correct, we need to update/upload the details of issuance of HSRPs into “VAHAN” or if any other Department Portal, PI confirm and elaborate.</p>	<p>The said write up shall enable the Govt. of Tamil Nadu to understand the online process with regard to issuance of HSRPs.</p> <p>Tender conditions shall prevail.</p>
11	17	4.2.1	<p>xxviii) The bidder shall furnish a list of court cases/ litigations involving the bidder along with the bid document if involved. If any such court cases/ litigations is found afterwards, the bid becomes invalid.</p>	<p>Under 4.2.1.(xxviii) it has been asked to furnish court cases/ litigation involving the bidder along with the bid document if involved. We request to clarify that do we need to furnish only the live cases along with the cases that has been already settled or only the live cases?</p>	<p>The list of only pending court cases related to High Security Registration Plates is to be submitted.</p> <p>That the other cases that have already gained its finality has no relevance and is not required to be submitted.</p>
12	25	4.23	<p>SIGNING OF AGREEMENT 4.23.1 At the same time the Transport Commissioner notifies to the successful bidder that his bid has been accepted, he will be directed to attend the Office of the Transport Commissioner on a</p>	<p>Query 1: For signing of agreement as mentioned under clause 4.23, is SPV need to be formed by the Consortium members?</p>	<p>Tender conditions shall prevail.</p>

			date determined for signing the formal agreement between the parties. The signing of the agreement shall take place only after furnishing of Performance Security by the bidder as per Clause 4.22.		
13	28	5.9	The successful Bidder should make his own arrangement for creation of Affixation Location.	<p>Query 1: We request the Transport Department to provide or allocate required space and Power to Store the Blank Plates & carry out Embossing & Affixation, etc in the RTO or at designated, Registration Premises., etc Locations.</p> <p>Please clarify and elaborate as we are in a understanding that Department will provide the space & Power to Implement this Project.</p>	<p>Bidder has to make its own arrangement.</p> <p>Tender conditions shall prevail.</p>
14	30	6.1.15	“Lead bidder shall mean the partners of a Consortium which shall be answerable and accountable to the Government of Tamilnadu and shall interface which the Government on behalf of the / Consortium for the successful execution of the project for the entire agreement period.	<p>Query 1: Defines “Lead Bidder” which does not find a place in the IFB till section IV.</p> <p>The IFB fails to define “Technical Member” which prominently finds place till Section IV of the IFB.</p> <p>This shows that the original IFB issued in March 2016 has been hastily edited without application of mind.</p> <p>Query 2: The main body of the IFB mentions Technical Member and Lead Bidder does not find a place anywhere. Yet, 6.6.1 fails to define Technical Member but define Lead Bidder which finds mention in mostly all annexures e.g. “Annexure VII, Annexure XII etc., Also, Joint Venture finds place in the Annexure III. Major Bidder also finds a place in Annexure XII.</p> <p>Query 3: Defines ”Lead Bidder” which does not find a place in the IFB till section IV.</p> <p>The IFB fails to define “Technical Member” which prominently finds place till section IV of the IFB. This shows that the original IFB issued in March 2016 has been hastily edited without application of mind.</p>	<p>Tender conditions shall prevail.</p>
15	31	6.2	The Contract will be for a period of seven years commencing from	<p>Query 1: Period Of Contract</p>	<p>The contract shall be awarded to two successful bidders in equal proportionate and</p>

			<p>the date of commencement of the scheme. A detailed agreement shall be entered into between the successful bidder and the Department for a period of seven years and the Department ensures that no second Contractor will be approved during the currency of the contract in the State except in case of termination of the contract, in view of the strictest adherence to High Security features and to impose accountability on the successful bidder. Such agreement would be extendable up to two years subject to the satisfactory compliance of performance during the contract period.</p> <p>The /Consortium agreement shall form part of the agreement with the department. Transport Commissioner has got the right to alter the terms of /Consortium agreement to suit this main contract.</p>	<p>The Contract will be for a period of Seven years commencing from date of commencement of the scheme. A detailed agreement shall be entered into between the successful bidder and the Department for a period of seven years and the Department ensures that no second Contractor will be approved during the currency of the contract in the State except in case of termination of the contract, in view of the strictest adherence to High Security features and to impose accountability on the successful bidder.</p> <p>Such agreement would be extendable upto two years subject to the satisfactory compliance of performance during the contract period.</p> <p>Query 2: <u>Period of Contract – 7 years with 2 years extension.</u> MoRTH in Rule 50 of CMVR 1989 has mandated that all existing registered vehicles should be affixed with HSRP within two years of commencement of contract. This seven years should be amended to two years to ensure compliance of Rule 50 of CMVR 1989.</p> <p><u>6.2 Change in terms of Consortium contract.</u> Changes in Consortium Agreement after opening and finalizing the bid, should not be allowed. This will lead to changes in the entire bid, thus making the bidding process irrelevant. The Contract agreement with The Govt of Tamil Nadu is available as Annexure XX. The terms of the consortium agreement are missing. This needs to be documented and all bids as consortium MUST agree to the terms and conditions laid down by the Tamil Nadu Government.</p> <p>Query 3: PERIOD CONTRACT The contract will be for a period of seven years commencing from the date of commencement of the scheme. A detailed agreement shall be entered into between the successful bidder and the department for a period of seven years and the department ensures that no second contractor will be approved during the currency of the contract in the state except in case of termination of the contract, In view of the strictest adherence to high security features and to impose accountability on the successful bidder.</p> <p>Such agreement would be extendable upto two years subject to the satisfactory compliance of performance during the contract period. The/Consortium agreement</p>	<p>in accordance to clause 4.19.2 (4.19.2 The entire State has been designated in two Zones namely Zone-A and Zone-B (as per Annexure- I) and the selection will be 2 separate bidders (L1 And L2 wherein L2 has to match the rate of L1) to execute the scheme in their Zones. The selection of the bidder will be through one bid/ tender and strictly as per eligibility conditions of the bid document.)</p> <p>The bidder need to give service as 5 year warranty.</p> <p>The word Joint Venture shall be treated as consortium throughout the IFB</p>
16	32	6.5	<p>6.5 ROYALTY The successful Contractor shall pay on monthly basis to the State Government as Royalty, a sum</p>	<p>Query 1: 1. The authority is requested to amend the said clause as below: “The successful Contractor shall pay on monthly basis to the State Government as Royalty, a sum of equivalent to 5% of the amount collected on base price of High Security Registration Plates</p>	<p>The royalty shall be paid exclusive of tax. Bank details for online payment of monthly royalty shall be shared post award of the contract.</p>

			equivalent to 5% of the amount collected on sale of High Security Registration Plates from Vehicle Owners. The detailed list will have to be maintained by the authorized bidder on each REGISTERING	collected from Vehicle Owners". 2. Online Royalty payment provision shall be allowed (through) NEFT/RTGs etc. Kindly provide the bank details for Online payment of royalty.	
17	32	6.6	The contractor shall provide samples of High Security Registration Plates required for all categories of vehicles duly certified from authorized testing agencies. The samples will be made available to all the registering authorities in order to check / compare future supplies of High Security Registration Plates.	Samples need to be submitted to the Transport Commissioner office, post award of the contract along with the COP Certificate.	The samples that are to be submitted are already covered under the COP audit process of testing agencies.
18		Annexure-1	Annexure-1- Zone A and Zone B Distribution of vehicular population has been done in uneven manner	The authority is requested to distribute the Zones into equal proportionate manner as the costing of HSRP and the entire project totally depends on the volume.	Annexure-1 distribution of vehicular population in two zones is tentative and the exact distribution shall be done at the time of award of contract and its vehicular population shall be equally distributed so that the selected bidders can convert the old vehicles into HSRP within the time frame.
19				1. Preconditions prevent - Leading suppliers not to tender	
20				In HSRP tenders, for example, setting pre condition's such as a requirement to have produced a certain volume of number plates prior to tendering prevents good quality manufacturers to supply HSRP plates.	
21				If the leading supplier or suppliers do not tender, the purchaser can only consider bids from suppliers who do tender. If leading suppliers are not considered, the purchaser may end up buying inferior product or service.	
22				2. Use of cheaper, poor quality materials and /or labour	
23				A supplier is forced to play the competitive bidding game may come under pressure to keep costs down to ensure he gets a satisfactory profit margin. One way a supplier can lower costs is by using cheaper labour and /or materials. If the cheaper labour and materials are poor quality, the customer will often end up with inferior, poor quality goods or services. This has happened several times in HSRP tenders and the tender has been cancelled.	
24					
25				1. Ref: GSR 104(E) dated 11.02.2020 published on 12.02.2020., The Central Motor Vehicle Rules	That the tender has been issued in compliance

			<p>1989 has been amended in rule 50 and has come into effect on 12.02.2020, the date of publication wherein</p> <p>Justification:</p> <p>(a) All three entities above, namely (i) The Registering Authority, (ii) Vehicle manufacturer and their dealer and their dealer and (ii) Approved License Plate manufacturers on their dealers are placed on an equal footing.</p> <p>(b) A HSRP Type Approval Certificate holder no longer from the date of 12.02.2020 when G.S.R 104(E) was published in the official gazette, it appears, needs the Government of the State to authorise the issuance of HSRP for existing old, registered vehicles so long as a valid TAC is available and the plate conforms to the TAC and the standard operating procedures of manufacture, issuance, affixation and accounting are observed.</p> <p>(c) So also, a vehicle manufacturer and their dealer does not need any authorisation from the Government for the issuance of HSRP for existing old, registered vehicles in a state.</p> <p>(d) It follows that HSRP manufacturer with TAC is ELIGIBLE issue HSRP through a vehicle manufacturer and through their dealer without the necessity for any permission or authorisation from the Government of the State, just as it is presently the practice in the case of newly registered vehicles wef 10.04.2019.</p> <p>(e) Subsequent to publishing GSR 104(E) on 12.02.2020, the Eligibility to issue HSRP by a TAC holder for existing old, registered vehicles appears inherent and it further appears in our opinion that no legal provision after the amendment of CMVR Rule 50 dt. 11.02.2020 exists to the contrary prohibiting the same.</p> <p>(F) High Security Registration Plates order of August 2001 amending CMVR Rule 50 empowered the Government of the State to select a manufacturer for manufacture and supply of HSRP for New as well as old vehicles as they existed in 2001 and the said document over time has been superseded and GSSR 104(E) is presently in place.</p> <p>(g) Under the circumstances, it is not known as to under what provisions, the Government of the state is Inviting bids for HSRP resurrecting a document that has been the root cause of the HSRP Project struggling to be implemented by the Government for the last 19 years.</p> <p>(h) It is also not known under what legal provision, the Government of the state will prohibit a HSRP Type approval certificate Holder from Issuing HSRP to Existing Old, Registered Vehicles entitled as eligible by the amended Rule 50 vide GSR 104(E) dt. 11.02.2019, wef 12. 02.2020 as per the Central motor Vehicle manufacturers and their dealers.</p>	<p>to S.O No. 6052(E) dated 06.12.2018 clause no.5 (ii) –(HSRP Order 2018)</p> <p><i>The manufacturers or suppliers of high security registration plates, if so authorised by the state concerned, may also supply the high security registration plate including the third registration mark on old vehicles after placing the registration mark.</i></p> <p>And Clause 2(d)</p> <p><i>The license plates with all the above specifications and the specified registrations for a new vehicle shall be issued by the registering authority or vehicle manufacturers and their dealers and for existing old registered vehicle shall be issued by registering authority or vehicle manufacturers and their dealers or by the approved licence plate manufacturers or their dealers. The Central Road Research Institute, New Delhi or any agency authorised under rule 126 shall approve the security registration as per the provisions of this rule”</i></p> <p>And Advisory issued by Ministry of Road Transport and Highways dated 16.09.2020, clause no.4.</p> <p>And As per the power laid to the State Government under Section 41(6), Section 47, Section 48, Section 64, Section 65 , Chapter IV of The Motor Vehicles Act, 1988.</p> <p>The main objective of the HSRP project is to prevent the vehicle theft and from being used for illegal activities. Issuance and affixation of</p>
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			<p>Extract from Tender document</p> <p>1.1.3 The bidder Company/Technical Member in the case of consortium must have Technical Experience in executing / executed HSRP Project for at least 5 Whole State/UTs in India for a minimum period of one year, as on the date of submission of the Bid. The scope of such contract should be for implementing HSRP in all RTO's and UO's of the respective State / UT.</p> <p>1.1.4 The Bidder and in case of consortium the technical member must have manufactured, supplied and affixed at least 5 Lakh HSRPs on Motor Vehicles for State Transport department in India in the last three financial year.</p> <p>1.1.5 The Bidder company Technical member (in case of Consortium) shall possess a valid Conformity of Production (COP) certificate on the date of submission of the Bid and must have completed minimum Ten (10) Conformity of Production (COP) cycle.</p> <p><u>Observation</u></p> <p>1. Copy of the Rule 50 in the tender document is Obsolete.</p> <p>2. The Central Motor Vehicles (Second Amendment) Rule 2019 vide GSR 104(E) dated 11.02.2020 effective on and from 12.02.2020 has also brought into effect AIS:159 Automotive Industry Standard, High Security Registration plates specifications and requirements.</p> <p>Registration Mark: means the marks as defined in the Rule 50 of the Rules.</p> <p>Observation: HSRP – Type Approved Non – Compliant</p> <p>1. It is to be noted that HSRP was mandated to be supplied by Automobile OEM manufacturers and their dealers WEF 01.04.2019 and fixed on to newly registered vehicles at the point of sale in the dealer showroom and details uploaded into Vahan Software/Other Software of respective states in order to release the RC.</p> <p>2. Vehicle Statics mentions that approx. 82% comprise of Two (2) wheelers and 2.5% Comprise of Three (3) Wheelers, the rest being 4 Wheelers or other categories.</p> <p>3. It is to be noted and there for all to see that OEMs with effect from 01.04.2019 appear to be supplying and Fixing on newly registered vehicles Type Approved HSRP which they may not know are Not Compliant and do not conform to the Type Approval Certificates of HSRP Vendor Manufacturers with whom contracts have been entered.</p> <p>4. With an approximation of One Lakh Registrations per day across India, over 80000 HSRP supplied and fitted on to Newly registered TWO (2) Wheelers and Three (3) Wheelers are possibly, TYPE APPROVED NO-COMPLIANT HSRP A TAHT DO NOT CONFORM TO THE Type</p>	<p>HSRP on newly registered vehicles by Vehicle manufacturers and dealers does not pose any major threat. While replacing and affixing HSRPs on existing vehicles need to be done after duly verifying the genuineness of the vehicle owner and the most efficient way of implementing it is possible by the Registering Authority. Also the vehicle manufacturers who have their vehicles registered in the State are no longer in business and such vehicles cannot be affixed with HSRPs. Also for new vehicles the HSRP is supplied by Vehicle OEM with the cost of HSRP included in the cost of vehicle. In case of replacing number plates with HSRPs in existing vehicles, service needs to be provided even to regions with very low vehicle count. To ensure even transparent pricing, it has been decided for the Registering Authority to implement the HSRP project for existing vehicles (vehicles registered prior to 01.04.2019) in the State of Tamil Nadu.</p> <p>The responsibility of the quality of HSRP is with the testing agency appointed by the Ministry of Road Transport and Highways</p> <p>We are assuring technical sound bidders by the tender condition stating minimum 10 COPs.</p> <p>That as per the Judgment dated 13.07.2016 passed in C.P(C) the Hon'ble Supreme Court of India has bestowed the responsibility of quality checking with the testing agencies.</p> <p><i>Para 34(ii) The testing agencies shall ensure that quality and specifications is not being compromised.</i></p>
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			<p>approval certificates issued by respective agency with reference to CMVR Rule 51, size of Letters and numerals and the space between them.</p> <p>5. As rightly pointed out by the MVD, Kerala State, approximately 80000 vehicle owners per day across the nation appear to have been issued TYPE APPROVED BUT NON –COMPLIANT HSRP thereby exposing public/citizens to the potential penalty of violating rule 51 of CMVR that is not known to them. This number could by a fair estimate be about 6000 Two and Three wheelers per day in the State of Tamil Nadu.</p> <p>6. WEF 01.04.2019 and spread over a 21 month period, an estimated 2.5 Crore Two (2) Wheelers and Three (3) Wheelers that can be shown or proved to be fitted with a Type Approved Non Compliant with the TAC issued to HSRP Manufacturers and therefore a DEFECTIVE safety COMPONENT of a Motor Vehicle</p> <p>7.HSRP has been classified under CMVR Rule 124 as a safety component of motor Vehicle and is supplied and affixed on Newly registered vehicles wef 01.04.2019.</p> <p>8. Such of those Motor Vehicles, More specifically Two (2) Wheelers and Three (3) Wheelers that can be shown or proved to be fitted with a Type Approved Non Compliant HSRP that does not conform to the TAC issued to a HSRP manufacturer Vendor supplied and fixed on to All newly registered 2 Wheelers and Three (3) Wheelers once classified as a defective component is by convention to be recalled and replaced with new HSRP by the Motor Vehicle Manufacturers and their dealers at their cost and consequence with no burden to be shifted on to the vehicle owner who was delivered the Motor Vehicles more specifically Two (2) Wheelers and Three (3) Wheelers affixed with a type Approved HSRP that is non compliant the cost of which was included in the total price paid for the Motor vehicle.</p> <p>9. Tracking and Tracing of Vehicles have been made easy by the presence of the Laser Branded ID on each HSRP that will also trace the Type Approved HSRP manufacturer Vendor and the Dealer of the OEM who supplied and affixed the offending HSRP on to the Motor Vehicle, more specifically Two (2) Wheeler and Three (3) Wheeler.</p> <p>10. It ios to be noted that HSRP of Dimension 500 x 120 mm and 340 x 200 xx may largely pass off as Tupe Approved and Compliant to Rule 51 of CMVR and a small percentage may be Non-compliant.</p> <p>Clarification:</p> <p>1. The Presence of an extremely large percentage of Type Approved HSRP that are Non-Compliant and Non Conforming to the TAC issued to HSRP vendor Manufacturers whose identities can be established by the Laser Branded 2 Alpha-10 Numeral HSRP, with due respect to the Additional</p>	
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			<p>Chief Secretary/Transport Commissioner, we seek to kindly, please clarify whether</p> <p>(a) An investigation will be launched into the subject matter that has now been brought on record through this tender document with eligible bidder conditions from among others, entities that have been supplying Type Approved, Non Compliant HSRP OEMs and their dealers</p> <p>(b) Will the Findings of this Investigation be communicated to MoRTH and all concerned in respect of States and Union Territories and made public so that all perfected members of public may be informed of a potential violation of CMVR Rule 51 That they are otherwise unaware of;</p> <p>(c) With due respect to the Additional Chief Secretary / Transport Commissioner, as the Government now having been made aware of a fact likely to affect the citizens of the country, initiate a mandatory recall and re-issue of Non-Compliant HSRP issued to all Newly registered Vehicles WEF 01.04.2019</p> <p>(d) The HSRP order of 2018 mentions that the Type Approval Certificate of Manufacturers will be suspended or cancelled and whether</p> <p>(i) With due respect to the Additional Chief Secretary / Transport Commissioner based on finding of an investigation, initiate penal action as per the Notification OR</p> <p>(ii) Whether the Laws will be suitable changed, amended or interpreted to protect an approximate 2.5 crore vehicle owners from Rule 51, CMVR Violation in which case the HSRP manufacturers who if found guilty of an offence will be penalised as per provisions of Law</p> <p>(iii) With due respect to the Additional Chief Secretary / Transport Commissioner, upon an investigation on the subject matter and its conclusive findings, causing public offence by supplying Type Approved but non compliant HSRP that are non compliant to Rule 51 of CMVR and not conforming to their respective TAC.</p> <p>(iv) Whether an advisory in public interest be issued to CMVR enforcing Authorities RESTRAINING THEM TO REFRAIN from charge – sheeting over an approximate 2.5 Crore in concern public citizens who are now face with the potential of a CMVR Violation under Rule 51 for no fault of theirs and not in their knowledge whatsoever.</p> <p>(v) Whether the authority calling for IFB intends to continue the tender process to create a monopoly of HSRP suppliers who have possibly committed an offence of supplying approximately 2.5 Crore 2 and 3 wheelers HSRP that are non compliant to Rule 51 and Non Conforming to their respective TAC even after discovery of possible violation in such large scale.</p> <p>(vi) Since the HSRP scheme is project of extreme NATIONAL importance and the Government was unable to implement the same because of emergence of a tender document that was since buried</p>	
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			<p>but now resurrected, with due respect to the Additional Chief Secretary / Transport Commissioner issue a Directive to all OEMs and their respective dealers to immediately ensure that HSRP AFFIXED ON TO ALL MOTOR Vehicles, more specifically Two wheelers and Three Wheelers are fully compliant to Rule 51 jof CMVR and Fully Conform to the TAC issued to the HSRP manufacturer/Vendor</p> <p>(Vii) With due respect to the Additional Chief Secretary / Transport Commissioner, we humbly seek to know whether the office of the Additional Chief Secretary / Transport Commissioner will recognise and acknowledge as Eligible suppliers of GSRP such of those HSRP Manufacturer Vendors that produce HSRP that are Fully Compliant with and Conform to the GAC issued to them as one ELIGIBLE to issue HSRP top existing Old, registered vehicles as per the provisions of the Central Motor Vehicle (Second Amendment) Rules 2019 dated 11.02.2020 published on 12.02.2020 on such directions or advisories that are deemed fit.</p> <p>(viii) With due respect to the Additional Chief Secretary / Transport Commissioner we humbly seek to know whether information will be sent to the Commissioner of Police, Chennai as an enforcing authority on the subject matter referred herein since his office is already aware of this volatile issue, pursuant to a press release from the office of the Commissioner of Police in 2020.</p> <p>(ix) With due respect to the Additional Chief Secretary / Transport Commissioner we seek to humbly submit that the problem arises out of each HSRP Type Approved Vendor Manufacturer, more particularly such of those Type Approved HSRP Manufacturers who have or have had Foreign Collaborators using a Front of their own and there are as many fonts as there are HSRP Manufacturers and therefore.</p> <p>(X) In keeping with the concept of One India / One ID / One Ration Card / One Election etc., will the Additional Chief Secretary / Transport Commissioner be a role model Government of the State to propose for HSRP with ONE NATIONALLY RECOGNISED FONT and to this end, I am more than willing to have my creation, the Motor Sign Tru Font, possibly the only genuinely and fully CMVR Rule 51 Compliant FONT to be taken over as the National recognised font on such terms and conditions mutually at cost, if so directed by the Government to ensure such violates never occur again, and there will be no interruption of the registered of Motor Vehicles for want of Type Approved Non Compliant HSRP</p> <p>(XI) Finally it must be observed that AIS-159 nowhere in the said document mentions the Specifications under Rule 51 even though the Testing Agencies certify in their Test Report annexed to the TAC the Dimensional requirements of the HSRP size of Letters and the space between them under Rule 51 of CMVR and even though the same is specifically mentioned in the scope of the document AIS-159 and therefore we humbly submit this omission in the Automotive Industry Standard be specified clarified to facilitate investigation into the subject matter for conclusive findings and corrective action in National Interest.</p>	
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Sd/Tenkasi S Jawahar,
Additional Chief Secretary/
Transport Commissioner