



THE INSTITUTE OF
Company Secretaries of India

भारतीय कम्पनी सचिव संस्थान

IN PURSUIT OF PROFESSIONAL EXCELLENCE
Statutory body under an Act of Parliament
(Under the jurisdiction of Ministry of Corporate Affairs)

o/c

MCA: 2022

6th May, 2022

Shri Rajesh Verma, IAS
Secretary
Ministry of Corporate Affairs
Government of India
Shastri Bhawan
Dr. Rajendra Prasad Road
New Delhi -110001



Subject: Request for relaxation of time period w.r.t. Resubmission of forms in LLP V3 modules

Respected Sir,

This is with regard to the initiative of the Ministry of Corporate Affairs (MCA) towards digital transformation from MCA-21 V2 to the next stage of the MCA-21 V3 platform launching the LLP Module of filing.

In this regard, we wish to bring to your kind notice the practical difficulties being faced by the stakeholders with regard to submission and re-submission of forms as the system is new and therefore, there are few technical issues on the MCA-21 V3 portal:

- As a normal process, LLP e-forms are returned back to respective stakeholders for resubmission for removing discrepancy within given time-limit. However, since MCA-21 V2 got shifted to V3 modules, the stakeholders are unable to resubmit the forms after correction within the prescribed timelines. Thereafter, the time given for resubmission expired resulting into expiry of respective SRNs, resulting in defaults. This has affected the registry and the event (resubmission) cannot be reported to the Ministry.
- In some cases, although web-forms were submitted, the fees pertaining to such forms could not be paid within 7 days of SRN generation leading to SRN cancellation and forms marked for resubmission. Many professionals are also getting emails informing the SRNs being marked as 'Invalid' and 'Not taken on Record'. For such forms, the option of resubmission is also not available on the portal.

Vision

"To be a global leader in promoting good corporate governance"

Motto

सत्यं वद। धर्मं चर। इष्टकारं कुरु। त्रुष्टं चर।
इष्टकारं कुरु। त्रुष्टं चर।

Mission

"To develop high calibre professionals facilitating good corporate governance"

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- In cases of RUN LLP web form, after submission of form, payment is required to be made within 7 days of SRN generation. In case the user does not complete the payment within the said time period, the SRN gets cancelled and the form is marked for resubmission which given the ongoing technical issues is a challenging task. As per Rule 36(9) of LLP Rules, 2009, such document may be rectified only through fresh filing with payment of fee and additional fee, as applicable, without prejudice to any other liability under the Act.

The system is new and there are few data related issues in filing of routine forms like Form 11. The Institute has been sending all the technical issues faced by the professionals while filling up and uploading of the Forms under LLP.

In view of the above issues and concerns, we request you to kindly:

- grant relaxation of time period for resubmission of Forms for easing the stakeholders in this transition period to the new V3 Module;
- allow one time opportunity for resubmission of forms which are NOT TAKEN ON RECORD;
- allow waiver of additional fees for various LLP Forms upto 30.05.2022; and
- allow waiver of additional fees for Form 11 i.e. Annual Return of LLP upto 31.07.2022

We hope that the above submission would be considered favorably.

We shall be pleased to provide any further information in this regard on hearing from your goodself.

Thanking You,

Yours faithfully

(CS Asish Mohan)
Secretary