

COMPANIES ACT 2013 | V3 PORTAL | SECTION 77 | SECTION 92

MCA21 V2 Decommissioning: T-53 Days to Cutover

Final 5-Week Sprint Plan to the June 30, 2026 Hard Cutover

53

Calendar Days Remaining

~7.5 working weeks to the hard cutover

CA Adityavikram Banka, Director — A S Banka Advisors Private Limited

What Changes on July 1, 2026

53

Calendar Days Left

Jun 30

Hard Cutover Date

2026

Jul 1

V2 Read-Only

2026

Jun 26

Practitioner CoB Deadline

2026

V2 vs V3 After Cutover

Capability	V2 Post-July 1, 2026	V3 Post-July 1, 2026
Fresh form filings	NO	YES
DSC re-registration	NO	YES
Historical attachment downloads	Read-only (untrusted)	Source for fresh filings
Underlying SRN evidentiary value	YES (records remain authentic)	YES (new V3 SRN format)
Pending CHG/AOC approvals	Continue, certificate on V3	YES

5 Gaps Eating Week 7

The migration gaps practitioners are still hitting at Week 7 — and the targeted fixes to close them before the June 30, 2026 hard cutover.



1

Orphan DSCs Not Re-registered on V3

Fix: V3 profile → Associate DSC → OTP+DSC validation. Allow 10–15 min per holder. Complete by May 22, 2026.

2

Charge Filings (CHG-1/CHG-4/CHG-9) Stuck Mid-Workflow

Fix: By May 22, 2026 — decide: complete-on-V2 or restart-on-V3. Section 77's 30-day window (60 with additional fee) does NOT pause for cutover.

3

Historical Attachments Held Only on V2

Fix: By June 12, 2026 — build off-portal repository per CIN, year, document type (MoA/AoA, INC-22, DIR-12, MGT-14, AOC-4, MGT-7, charge docs).

4

V2 SRN Numbers in Client Correspondence

Fix: Maintain V2-to-V3 SRN cross-walk; flag external letters quoting V2 SRN for V3 follow-up reference during FY 2026-27.

5

Scanned PDFs Failing V3 Validation

Fix: Regenerate as searchable OCR-enabled PDFs under 6 MB before FY 2025-26 filing deadline.

8-Week Sprint Calendar

Week-by-week recommended focus to clear V2 by June 30, 2026.

Week	Dates	WD	Sprint Focus
7	May 8–15	5	Inventory: pending V2 filings, orphan DSCs, historical attachments
8	May 18–22	5	DSC migration: every active Director, Auth Signatory, PCS/PCA on V3
9	May 25–29	5	Charge filings: close CHG-1/4/9 mid-workflow on V2 or restart on V3
10	June 1–5	5	Annual return prep: MGT-7/MGT-7A/AOC-4 V3 trial for top 5 clients
11	June 8–12	5	Historical exports: pull all client attachments off-portal
12	June 15–19	5	Resubmissions: close every "Mark for resubmission" V2 status
13	June 22–26	5	Last call: all V2 filings signed and uploaded by EOB June 26
14	June 29–30	2	Final V3 smoke tests; document open items for FY 2026-27

Note: FY 2025-26 MGT-7/MGT-7A/AOC-4 are NOT due by June 30. The 60-day Section 92 clock from AGM date applies. Early V3 drafting in Week 10 surfaces schema mismatches while V2 remains available for cross-checks.

Forms and Sections at Risk

Forms Migrating to V3

MGT-7

MGT-7A

AOC-4

DIR-3

INC-22

INC-22A

CHG-1

CHG-4

CHG-9

DIR-12

MGT-14

DPT-3

BEN-2

Statutory Anchors

Section 77, Companies Act 2013

Charge filing 30-day window (60 days with additional fee). Cutover does **NOT** extend this window.

Section 92, Companies Act 2013

Annual return 60-day window from AGM date. V3 MGT-7 is live and accepts FY 2025-26 data.

Section 90(11), Companies Act 2013

SBO compliance — parallel V3 load with BEN-2 30-day filing window applies.



Who Carries the Weight?

Each stakeholder group has a distinct set of responsibilities in the 53-day sprint to the V3 cutover. Here is how the workload splits across the compliance ecosystem.



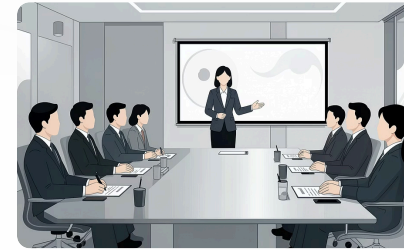
Company Secretaries (PCS)

- Run portfolio inventory by May 15
- Re-register every active DSC by May 22
- Final V3 smoke test June 29–30
- SRN cross-walk maintained for FY 2026-27



CA Practitioners

- Charge filing decisions (CHG-1/4/9) before May 29
- Off-portal repository by June 12
- Trial MGT-7/AOC-4 on V3 in Week 10 to surface schema mismatches before AGM



In-House Compliance Leads

- Brief CFO/Board on the 53-day clock
- Close every "Mark for resubmission" item by June 19
- Document open items for FY 2026-27 follow-up
- Coordinate with lenders on charge SRN references

Risk of Deferring Past June 26, 2026

The final 96 hours before the V2 cutover carry compounding operational risks. Each risk below has been observed in prior MCA portal transitions and is likely to recur at higher severity given the scale of the V2-to-V3 migration.



Portal Congestion

V2 becomes unreliable in the last 96 hours of any major cutover as filing volumes spike.



DSC Validation Timeouts

Re-affixation cycles fail under load; re-queues add hours to each filing cycle.



Payment-Gateway Retries

Filings get stuck in a pending-payment loop with no clear resolution path.



MCA Help-Desk Lag

Normal 48-hour SLA stretches to 7–10 days during peak cutover congestion.

⊗ Critical: A CHG-1 not signed by June 26 rolls into July 1 as a V3 re-filing — fresh fee, fresh DSC affixation, fresh attachments. **Section 77 does NOT pause.**

9-Step Decommissioning Playbook

A cascading action plan from Week 7 through July 1, 2026. Each step has a hard deadline — missing one compresses the next.

01

By Fri, May 15 – Portfolio Inventory

One row per entity: pending V2 filings, orphan DSCs, historical attachments to export.

02

By Fri, May 22 – DSC Migration Complete

Every director, authorised signatory and PCA/PCS re-registered on V3 with OTP+DSC validation confirmed.

03

By Fri, May 29 – Charge Filing Binary Decision

For each CHG-1/CHG-4/CHG-9 mid-workflow: complete on V2 or formally restart on V3. No ambiguity.

04

By Fri, June 5 – V3 Trial Drafts

FY 2025-26 MGT-7/MGT-7A/AOC-4 trial drafts for top 5 clients to surface V3 schema mismatches early.

05

By Fri, June 12 – Historical Exports

Off-portal repository per client: CIN / year / document type (MoA, AoA, INC-22, DIR-12, charge docs).

06

By Fri, June 19 – Close All Resubmissions

Every V2 "Mark for resubmission" status resolved and cleared before the final sprint week.

07

By Fri, June 26 (CoB) – All V2-Only Items Signed

Hard practitioner deadline: all V2-only filings signed, uploaded and SRN confirmed before close of business.

08

Mon–Tue, June 29–30 – V3 Smoke Tests

Final V3 validation runs; document all open items in writing for FY 2026-27 follow-up.

09

Wed, July 1 – V2 Read-Only

V2 is now read-only. Do NOT promise clients V2 access for fresh filings. All new work on V3 only.

Lead the Cutover, Don't Get Caught By It

53

Days = ~265 Working Hours

Per portfolio — the clock is running now.

→ **DSC Re-registration Is Underestimated by 3x**

Most CA/CS firms budget 5 minutes per DSC. Real-world validation cycles with OTP, portal lag and re-affixation average 15 minutes per holder at scale.

→ **External Letters Quoting V2 SRN Need V3 Follow-Up Referencing**

Lender letters, ROC correspondence and board resolutions citing V2 SRNs must be cross-walked to V3 SRN format for FY 2026-27 evidentiary continuity.

→ **FY 2025-26 Annual Returns Can Pre-Test V3 Schema in Week 10**

MGT-7/MGT-7A/AOC-4 are not due by June 30 — but trial drafting in Week 10 while V2 is still live is the safest way to surface V3 schema mismatches before AGM season.

✔ **Need help sequencing your V2-to-V3 migration sprint?** Talk to A S Banka Advisors Private Limited.

[Book a 30-minute call → calendly.com/asbanka-info/30min](https://calendly.com/asbanka-info/30min)

CA Adityavikram Banka, Director — A S Banka Advisors Private Limited

CROSS-BORDER STRUCTURING

COMPANIES ACT 2013

V3 PORTAL COMPLIANCE