Counter Comments on 'Six'. Issues for Consultation
on
KYC of DTH Set Top Boxes

1) Is there a need for KYC or e-KYC of DTH Set Top Boxes to address the concern raised by MIB in their letter mentioned in paragraph 1.5 of this consultation paper? Give your answer with justification.

Four concerns of MIB emerge from Chapter I and Chapter II of consultation paper. The resolution of these issues by KYC is just not possible.

'One'-Smuggling of DTH Equipment

"1.5 restricting smuggling of DTH equipment illegally to other countries:" "1.6 regarding the safeguards that can be applied for restricting smuggling of DTH equipment illegally to other countries:"

How smuggling can be stopped by KYC is beyond comprehension? This has to be tackled by specialist agency.

'Two'- Collection "of documents related to Proof of address (POA) and Proof of Identity (POI)"

"2.3 As is clear from the above, CAF contains information such as subscriber name, address contact number etc. but they are not mandated to collect documents related to Proof of address (POA) and Proof of Identity (POI) of the subscribers."

Are these over 70 million connections working without the relevant desired information available with DPO? Is help when needed is provided by DPO without the required information in CRM is ridiculous?There is no need for mandate in this regard Let each DPO evolve its own methodology.

'Three'- Money Laundering

Identification of customers also helps to control financial frauds, identify money laundering and suspicious activities, and for scrutiny/monitoring of large value cash transactions.

How money laundering be stopped by KYC is beyond comprehension? This has to be tackled by specialist agency.There is need for DPO to evolve methods for reducing CASH transactions for its own operations.The only thing appears to work smoothly in a DPO ecosystem is cash transaction for recharge.This needs to curtailed.DPO must open up cashless transactions and not restrict them to a few designated options.NEFT a universal method must be mandated for transactions with DPO.In this source and recipient are easiest to detect.This shall be a big boon to senior citizens. This may not ease the business but nevertheless release some squeeze on the customer/subscriber/user who directly bears all the cost of every one in the value chain.

Four- Change of location of STB not Captured in CRM

"2.13 At present, for DTH, there is no verification process in place to cross-check whether the address filled in the Customer Relationship Management (CRM) software and the actual address where the STB is installed is the same or changed by the consumer since not in all cases, whenever the subscriber changes his address, gets captured and updated in the CRM."

How KYC will help in eradicating this? Just not possible.

Accordingly there is no need for mandated KYC for addressing the concerns of MIB existing/future customers/subscribers/users as it will not be helpful in any case.

2) If your answer to Q1 is in the affirmative, then what process is to be followed?
No comments as answer to Q1 is in negative.

3) Whether one-time KYC is enough at the time of installation or verification is required to be done on periodic basis to ensure its actual location? If yes, what should be the periodicity of such verification?
No universal mandated KYC procedure for DPO Card may be practical due to diverse nature of DPO and as such may not be mandated and the process may be left to the best wisdom of DPO depending upon his own eco system of work ethos and of course with in the frame work of law of the land.

4) Whether KYC of the existing DTH STBs is also required to be done along with the new DTH STBs? If yes, how much time should be given for verifying the existing STBs for DTH?
KYC not recommended as it may entail some extra cost to customer/subscriber/user without any benefits except gathering a possible psychological impression of a potential threat.

5) Whether the location-based services (LBS) needs to be incorporated in the DTH set top boxes to track its location? Will there be any cost implication? Give your response with supporting data and justification.
*LBS need not be provided as the effort to do this may outweigh the benefits manifold. Moreover, no tangible DATA is made available to quantify the threat in the absence of the proposed service except the rhetoric. It may only cause discomfiture to existing users and may some costs may be passed on to them without getting any additional benefits. Response to **6)** is also relevant on the issue.*

6) Any other issue relevant to KYC of DTH Set Top Boxes
a) Let CPE for DTH be taken out of the purview of DOP.
b) Let that be the responsibility of the customer/subscriber/user.
c)The set top box as part of CPE may be DPO neutral
d)Let new set up box be developed having two ports one for DTH and second one for DTH by Cable
e) The subscriber should have the choice to use either or both modes at the same time'
f) DPO should provide only the card similar to SIM card of a Mobile phone which should fit into one of the ports of set top box available as part of CPE.
g) The card may be named a DPO CARD having the name of service provider on it.
h) No universal mandated KYC procedure for DPO Card may be practical due to diverse nature of DPO and as such may not be mandated and the process may be left to the best wisdom of DPO depending upon his own eco system of work ethos and of course with in the frame work of law of the land.

X---------PS.--- *Paras 2.11 and 2.12 missing in consultation paper* x--------------x-----------x----------x------x