

Sub: Comments on MVAS CP – Reg.

Ref: Consultation paper on Mobile Value Added Services, dated 21st July 2011

To

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2.60 & 4.10:

Service providers are investing / spending a lot on verifying the customer for **K.Y.C (Know Your Customer)** due to the strict instructions; this is to ensure that mobile connections should not go in to the hands of un-known/wrong persons in view of National Security.

Now mobiles are having access to multiple services in view of introduction of variety nature of Value Added Services through technological growth & converged environment. The customer of a Telecom Service provider is now a customer to many VAS providers.

Earlier, the access of a mobile customer is limited to Voice calls, SMS and little data related applications. But, now the range of access is increased to multi-fold, as we are all aware.

It is the responsibility of the every VAS providers to confirm themselves about their customer (KYC), in the scenario Voice is losing it's priority to VAS.

Since, 100% customer base verification is not practical by TERM cell of DOT, we all aware through news that few mobile connections are going in to the hands to un-traced people, in view of the multidimensional access of mobile through various VAS services, each & every VAS provider should have the confirmation of KYC w.r.t National security point of view.

Every service provider should able to supply the details of the Customer who is opting for VASPs, and VSPs in turn they have to cross verify the KYC of the customer.

While confirming KYC, if the information is not tallying with the KYC supplied by service provider, such customer cannot be provided any VAS, till both of the KYCs are regularized by a penalizing a premium to service provider. In such cases, a part of that premium will be passed to VAS providers for encouraging actual confirmation of KYC by VAS provider.

As we all aware that still another 3 to 5 years time will take for 100% providing ADHAR based verification in to system, till that time an alternate system can be brought in to system, for cross verification of KYC by releasing a new regulation/standard for issue of Photo Identify cards with following proposed suggested version:

- 1) Every Photo Identity card should contain residential address also. Such Photo Identify cards should provide only after actual verification by concerned firm/organization/agency (Govt. Or Pvt.)

- 2) Every firm/organization either Govt./pvt./etc, should upload their Photo Identity card data (including scanned both side of Photo ID card) in to a INCPID server (I.e. Indian National Centralized Photo Identify Card Server). This should happen when ever there is fresh issue or modification including existing cards.
- 3) KYC mandatory firms/organizations will be provided access to those Central Servers. Every verification will be acknowledged with unique code for future cross checking. For each such query, there should be nominal charges to be collected & shared to the card issuing firms/organizations, with periodical reports as required time to time.
- 4) Size, format & shape specifications of Photo ID cards are to be standardized in India.

To verify the KYC every agency is spending lot for actual verification of the person, since every one cannot approach the firm/organization who issued that ID card for every time or every case. Due to the technological advancement, no one can identify whether the original ID card is originally issued or locally prepared. If above such regulation/standard & procedures provided with instant access, not only VAS provider, every point of Identity Card Check, this methodology will be useful. (Example: 1) **The Service providers** can check the genuineness of the ID card proofs by simply logging to that INCPID server at the Point of Sale itself. 2) **Other users**: At Airport, if they input the Photo ID details, they can instantly can cross check whether it is actual or not).

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