



6 December 2021

Re: **Support of draft Telecommunication Tariff (66th Amendment)**

Dear Shri Amit Sharma, Advisor (Finance & Economic Analysis), TRAI:

We write in support of the implementation of the draft Telecommunication Tariff (66th Amendment).

The USSD channel can be used to effectively meet two key objectives for every Government:

- Eliminate Digital Fraud due to identity theft
- Enable Digital Inclusion and Financial Inclusion

Financial inclusion and fraud prevention are essential elements of today's world, and the telecommunications channel known as "USSD" should be used in the public interest. There is no greater public interest than national security and financial inclusion. We agree with the view that: "to protect the interests of the USSD users and to promote digital financial inclusion, rationalization of USSD charges is required. Accordingly, the Authority proposes to revise the framework for USSD based mobile banking and payment services by prescribing a "Nil" charge per USSD session for mobile banking and payment service, while keeping the remaining items of USSD unchanged".

Cyberattacks, ransomware, breaches, and fraud threaten national security and the entire economic ecosystem. We believe that authentication messaging via "push USSD" is essential to protecting those who use mobile banking and payment services and should be made readily available by all operators for all banking and payment-related services across all phones.

The Internet is a public network that is vulnerable to attack, with in-app authentication routinely compromised as a single point of failure on a public network. In-app authentication is regularly subjected to hacks, malware, SIM Swaps, and other forms of fraud. In addition to being inherently insecure, in-app solutions are not available on feature phones. In contrast, "push USSD messaging" on the secure signaling channel of the mobile operator network is a private channel that is only accessible with permission of the applicable mobile network operator, and is universally available on all mobile phones, including all smartphones and feature phones.

In addition to promoting financial inclusion, we believe that the USSD channel should also be used to eliminate fraud across all mobile activity. The use of USSD separates the authentication channel from the application, resulting in security that is both multi-channel and multi-factor.

Boloro Global Limited

100 Park Avenue, 16th Floor, New York, NY 10017, USA

E: contactus@boloro.com W: www.boloro.com





National security is an essential concern for every government and citizen, and the existing USSD infrastructure is ideally suited to be used in the manner that you have proposed, as well as for additional uses cases.

This proposal by the Government of India should in fact be adopted by regulators across the globe and we suggest a detailed briefing to Operators, so they appreciate their role in securing digital identities.

Boloro Global Limited, parent of Boloro India Private Limited, has built and patented a process that allows for tailored, instantaneous messaging over real-time USSD sessions, eliminating the single point of failure by layering a separate "lock and key" on top of any application.

We are ready to work with the government of India, banks, digital payment providers, telecom operators, and others to provide authentication solutions to prevent fraud and promote financial inclusion.

Please feel free to reach out to be directly at any time.

Thank you.

Sincerely,

Karl

Karl P. Kilb III
CEO
Boloro Global Limited

Karl.Kilb@Boloro.com

+1 917 854 7121

Boloro Global Limited

100 Park Avenue, 16th Floor, New York, NY 10017, USA

E: contactus@boloro.com W: www.boloro.com

