CAG
Citizen consumer and civic Action Group

Comments to Consultation Paper on KYC of DTH Set Top Boxes   **17.08.2019**

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

   No, there is no need for KYC or e-KYC of DTH Set Top Boxes.

   Reasons:
   1. There is no information/ data provided in the document to support the concern of illegal smuggling of DTH equipments to other countries, raised by MIB – What are the numbers that we are talking about? How and whom does it affect?
      Is it a security issue? If so, how?
      Or, is it loss of revenue? If loss of revenue, for whom?
   2. Making KYC mandatory for non critical services is unnecessary.
   3. At time of installation, DTH operators take the consumer's name, address and contact no. This is sufficient information and there is no need to collect documents related to proof of address and proof of identity. Submitting KYC is always a security and privacy concern for consumers
   4. As mentioned in the paper, it is only a one way transmission

2. If your answer to Q1 is in affirmative, then what process is to be followed?

   NA

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?

   As mentioned above, KYC is not necessary

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?

   As mentioned above, KYC is not necessary

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

   No, there is no need for LBS to be incorporated in the DTH STB's. As mentioned earlier, the paper doesn't clearly lay out the justification. As such, it may only help broadcasters monitor consumer preferences on a real-time basis, which is a concern of privacy for consumers.