COMMENTS AND VIEWS ON CONSULTATION PAPER NO.09/2019
Consultation Paper on KYC of DTH Set Top Boxes
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1)Is there a need for KYC or e-KYC of DTH Set Top Boxesto address the concern raised by MIB in their letter mentioned in paragraph 1.5 of this consultation paper?Give your answer with justification.
Some services such as banking service, telecom service arecritical from KYC point of view as Consumer has to be identifiedto catch fraud or for security breach. These are very critical services and can not be given to any one without POI and POA verification. In case of mobile services there have always been requirement of proper verification of documents and KYC process. However, in case of land line connection, KYC norms was never so stringent as connection has to be installed at the premisesonlyand address of the subscriber is verified by provision of service itself.

2)If your answer to Q1 is in the affirmative, then what process is to be followed?
It is no affirmative.

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?
Some people argue that KYC requirements for non critical serviceswillunnecessarily burden service providerswith substantial administrative obligations. The verification of POI and POAplacesa financial burden on service providers due to the costinvolved. However, now technologies have enabled low cost solution for KYC

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?
No,it is not required.

5)Whether the location-based services (LBS) needs to be incorporated in the DTH set top boxes to track its location? Will there be anycost implication? Give your response with supporting data and justification.
DTH operators are following a physical CAF process to be filled by subscribers before subscribing TV services. Use of CAF in paper format is prevalent and manual process is followed for updating information in the SMS. The process of millions of physical CAFs and their storage creates storage difficulties.
However, TRAI has issued an advisory to all the DPOs for
11use of electronic Customer Application Form(e-CAF) (Annexure-III) on 5thFebruary 2016 to bring efficiencies in the process of providing and managing services to the subscribers and easier storage of millions of CAFs resulting in less operational costs. QoS Regulation 2017 also allows DPOs to collect the CAF form electronically.

6)Any other issue relevant to KYC of DTH Set Top Boxes?
No,nothing as such as of now.