File No.18-05/2019-DGT/2

(09)

Government of India
Ministry of Communications
Department of Telecom
O/o DG Telecom HQ

Dated 24/12/2019

To

All Heads of all the LSAs

Subject: CAF audit related issues

ACT has raised certain issues regarding D-KYC Audit Guidelines and requested for clarifications regarding D-KYC audit Guidelines issued on 16.10.2019. The issues raised were examined and decision taken thereon is placed at Annexure-I.

2. Further, it is stated that for certain points i.e. Sr No. 3 (Capturing of transaction ID on CAF) & Sr. No. 5 (regarding photograph of PoS in the List of PoS) of para 1 of minutes regarding D-KYC related matters, the timelines has been extended till 31.03.2020. Except this extension, the audit of D-KYC based CAFs is continued to be carried based on earlier instructions No. 18-8/2018-DGT/2 dated 16.10.2019.

3. In view of above, LSAs are requested to take necessary action accordingly..

This issues with the approval of Competent Authority.

Signature Not Verified
Digitally signed by KARAN GOYAL
Date: 2019.12.24 17:09:12 IST

Encl: As Above

(Karan Goyal)
ADG (P&N)

Copy to:
1. DDG (AS), AS Wing, DoT HQ with a request to bring into notice of all TSPs
2. ACT

Decision taken on the industry representation on d-KYC based CAF audit are as given below:

SN	Issue	Industry Submission	Decision
1	TSPs shall submit the soft copies (.pdf format) of the CAFs of mobile connections activated through alternate D-KYC process to respective LSAs. **(Clause 1. iii of DoT guidelines dated 16.10.2019)**	Many options of standard digital file formats such as JPG, JPEG, TIFF, PNG, etc. are available with Microsoft Windows these days. The aim is to keep the file light with ample clarity and security. Hence, the format should not only be restricted to pdf which necessarily requires Acrobat Reader to be installed on a computer system. To fulfill the above objective, other commonly used file formats along with pdf should also be allowed	Only .pdf format is allowed and existing guidelines to continue.
2.	The live photograph of the original POI/POA documents shall be captured in proper light so that they are clearly readable and identifiable. No skew or tilt in the mobile device shall be there while capturing the live photograph of the original documents. **(Clause 2 (b) (i) of DoT guidelines dated 16.10.2019)**	PoS can only try on best effort basis to avoid any kind of skew or tilt. However, sometimes due to light effect, condition of the document, etc., a legible photo is only possible with a little skew or tilt. Thus, the requirement should only be specified as legible live photograph of original PoI/PoA as described and readable water marking as described must be placed on live photograph of PoI/PoA. Hence, the part of the clause marked in red shall be removed.	As long as the photograph of original POI/POA documents are clearly readable and identifiable, these are to be accepted.
3	**Transaction id/reference id number of the process:** There should be a unique Transaction/reference id number in the CAF as well as in the subscriber database of the Licensee. **(Clause 2 (d) of DoT guidelines dated 16.10.2019)**	We wish to clarify that operators are using different logics for transaction/reference id. Few operators are using CAF number itself as transaction id and few operators are randomly generated ID's. There is no provision to mention this information on CAF hence we are unsure of how TERM cells will verify this information. Request you to clarify and in case the requirement is to start capturing this information, the same should be done after 1 month of clarification.	Transaction Id needs to be captured both on CAF and subscriber database and it should be unique. However, operators can use their own logic to populate transaction Id. Accordingly, the CAF format may be treated as modified to include transaction Id However on the request of ACT, it is decided that for capturing the transaction Id on CAF, extension till 31.03.2019 is granted.

31.03.2020

4	**Digital Signature of authorized representative of the Licensee**: The CAF must be digitally signed by the authorized representative of the Licensee. For this purpose, TSPs shall submit list of Authorized Representatives of Licensee with his/her name, mobile number, designation for digital signature on CAF along with monthly / quarterly subscriber database. Alternatively, the use of digital signature of the telecom company is permitted. **(Clause 2 (e) of DoT guidelines dated 16.10.2019)**	As per DoT guidelines dated May 27, 2019, use of digital signature of telecom company is permitted. This is being followed by all the TSPs and in such case, there is no need for detailed list of Authorized Representatives of Licensee. Also, the CAF and monthly database format provided by DoT dated August 19, 2019 does not specify capturing of mobile number of the AR/AO separately. If at all the AR/AO details are to be shared, the requirement of mobile number needs to be dropped. List of AO with Name and designation is already provided in the database given to LSAs, however mobile number is not captured in the complete journey as we have system based access (Login & Password) for each AO.	A separate list of Authorized Representatives of the Licensee who is responsible for digital signature on CAF to be submitted by TSPs to LSAs along with monthly/quarterly subscriber database. It should contain name and designation of Authorized Representative. There is no requirement of mobile number of the Authorized Representative in the list to be submitted by the TSPs.
5	The TSPs shall submit the (a) List of Authorised Representatives of Licensee with his/her name, mobile number, designation for digital signature on CAF and (b) List of PoS with name, address, mobile number and photograph along with monthly/quarterly subscriber database. **(Clause 3 of DoT guidelines dated 16.10.2019)**	(a) Same as above point 2.e). (b) The CAF format provided by DoT dated August 19, 2019, does not specify PoS photograph to be part of the subscriber database. Therefore the PoS photograph is not being stored separately, it is getting captured in the CAF itself. The issue was discussed in detail with DoT stating that this would unnecessarily increase the size of the database. Thus, this requirement of PoS photograph should be removed from audit parameters. The audit instructions are NOT very clear if these lists are to be shared separately OR part of the monthly database. The latter is logical, and is already part of monthly database format as issued by DoT. No additional field should be part of audit if NOT given as part of the earlier instructions.	Separate lists of Authorised representatives and PoS as mentioned in the guidelines are tobe shared along with monthly/quarterly subscriber database. However, as clarified in para 4 above, ~~in~~ the list of Authorised representatives, mobile number is not required. The requirement of PoS photograph in the List of PoS is an essential requirement. However on the request of ACT, it is decided that for preparing the list of PoS including photograph of PoS, extension till 31.03.2019 is granted. 31.03.2020
6	These guidelines define broad framework for the purpose of auditing the D-KYC based CAFs. In	The entire purpose of having common guidelines is to ensure uniform approach followed by each LSA. By stating that they may adopt any additional measures,	No change in existing guidelines.

	addition to these guidelines, LSAs may adopt suitable practical measures, if required, to audit the D-KYC based CAFs. **(Clause 4 of DoT guidelines dated 16.10.2019)**	chances of differential treatment by different LSAs increases, leading to understanding gaps between the TSPs and LSAs in different circles. This differential treatment defies the entire essence of maintaining uniformity in the conduct of audits by the LSAs. We also foresee non-practical and differential interpretations of the various Digital SV instructions, which may lead to arbitrary and illogical cases of non-compliances in the CAF, leading to unsustainable penalties and unnecessary litigation. The whole objective of issuing these common guidelines is to maintain uniformity. Hence, this clause should be removed.	
7	DoT has issued instructions for D-KYC process vide letter dated 06.11.2018 (POC of D-KYC process) and dated 03.04.2019. These D-KYC based CAFs will be audited through these instructions only, till above CAF audit guidelines become effective. No separate audit instructions shall be issued. **(Clause 8 (ii) of DoT guidelines dated 16.10.2019)**	Our understanding of the clause is that all CAFs under PoC will be audited based on the guidelines of November 06, 2018 and CAFs of connections activated vide guidelines dated 03.04.2019 will be audited basis guidelines dated 03.04.2019 itself. All CAFs generated post issuance of audit guidelines will be audited based on these audit guidelines issued on October 16, 2019, applicable from the date of implementation. We understand that CAFs generated before these guidelines cannot be audited basis these guidelines as the process may have been a little different. However, when the database is submitted to the LSAs, it will contain all kinds of CAFs **(generated based on PoC as well as final guidelines). We are not sure how the LSAs will bifurcate these CAFs for audit** purpose. We thus need more clarity on this clause	The understanding of the industry is correct. These guidelines dated 16.10.2019 for audit of D-KYC based CAFs will be applicable only in respect of the CAFs acquired after these guidelines become effective.
8	**Issue Related to CAF and Database Formats** :In the monthly subscriber database format, a fixed character limit is assigned to each line item. However for few line items this fixed character limit does not	In the monthly subscriber database format, a fixed character limit is assigned to each line item. However for few line items this fixed character limit does not carry any significance. For eg: CAF Number. For this field the character limit in the monthly subscriber database format is assigned as 10. As you are	Presently, the limit in subscriber database for CAF serial no. and transaction id is assigned as 10 characters. The length of CAF serial Number and Transaction id

	carry any significance. For eg: CAF Number. For this field the character limit in the monthly subscriber database format is assigned as 10. As you are already aware that the length of the CAF Number does not have any bearing on the subscriber verification Hence we would like to suggest that the DoT should assign a flexible character limit for such line items in the monthly subscriber database. For eg: a CAF Number can range in the length upto 15 characters.	already aware that the length of the CAF Number does not have any bearing on the subscriber verification Hence we would like to suggest that the DoT should assign a flexible character limit for such line items in the monthly subscriber database. For eg: a CAF Number can range in the length upto 15 characters.	fields in the CAF and subscriber database should be flexible and limited upto 15 characters. The CAF and database format may be treated as modified to this extent.