DEPARTMENT OF INFORMATION TECHNOLOGY AND COMMUNICATION

3.4 Information Technology Audit of Citizen Centric Service Delivery Project (e-Mitra)

Highlights

Government integrated both Lok Mitra and Jan Mitra under new title e-Mitra which started operating in October 2005 in Jaipur City. The Primary objective of the e-Mitra was to provide integrated services pertaining to Government Departments to the public in an efficient, transparent, convenient and friendly manner using Information Technology (IT) to maximise speed, accountability, objectivity, affordability and accessibility from the perspective of the citizens. Under the e-Mitra project, citizens were supposed to avail three types of services from any e-Mitra kiosk. Information Technology Audit was conducted to assess the planning process, convenience, affordability, accessibility, speed of the services provided, system security and monitoring and evaluation of the project.

The Directorate of Information Technology and Communication had prepared a project report without conducting a feasibility study and there was no documented disaster recovery and business continuity plan.

(Paragraph 3.4.6.1)

All the Departments were not within the ambit of the *e-Mitra* project. Those within ambit were not fully prepared as they lagged in computerisation.

(*Paragraph 3.4.6.2*)

The Local Service Providers (LSPs) provided limited services of bill collection only to the citizen and none of the LSPs provided the public information services, application and grievance related services to the citizen. Only the Government run *e-Mitra* centers provided these services.

(Paragraph 3.4.6.2)

Kiosks were not opened in rural areas in Sawaimadhopur District, normal working hours were not followed and hygienic facilities were not provided to the citizen in violation of Service Level Agreement.

(*Paragraph 3.4.6.4*)

Penal provisions for delayed deposit of the amounts collected and deficient performance were not imposed on the LSPs.

(Paragraphs 3.4.6.5 and 3.4.6.6)

3.4.1 Introduction

Government of Rajasthan launched two-citizen centric service delivery projects namely *Lok Mitra* in Jaipur and *Jan Mitra* in Jhalawar Districts (March 2002). *Lok Mitra* was basically an urban centric project with more thrust on utility payments, *Jan Mitra* was an integrated e-platform to deliver desired information and services related to various Government Departments at kiosks in villages. Government integrated both *Lok Mitra* and *Jan Mitra* under new title *e-Mitra* which started operating in October 2005 (Jaipur City). The Primary objective of the *e-Mitra* was to provide integrated services pertaining to Government Departments to the public in an efficient, transparent, convenient and friendly manner using IT to maximise speed, accountability, objectivity, affordability and accessibility from the perspective of the citizens. Under the *e-Mitra* project, citizens were supposed to avail three types of services from any *e-Mitra* kiosks across the State viz.

- * Utility bill payment services,
- * Submission of application forms/ grievances for various Government Departments, and
- * Providing information related to various Government Departments.

3.4.2 Organisational set up

The Department of Information Technology and Communications (DoIT&C) issues necessary guidelines and provides technical support to run the *e-Mitra* Project in the State. District *e-Mitra* Societies headed by the District Collector as Chairman were formed (January 2008) in 32 districts to look after the implementation and day-to-day operation of the Project in the districts.

Local Service Providers (LSPs) namely (i) CMC Computers Ltd, (ii) Easy Bill Ltd. and (iii) Aksh are private partners providing services in Jaipur District and CMC Computers Ltd. in Sawaimadhopur District, by setting up the infrastructure and operating 176 *e-Mitra* centers/kiosks in Jaipur and six centers/kiosks in Sawaimadhopur District.

The DoIT&C signed Memorandum of Understanding (MoU) with various Departments to access their data and to collect bill payments on behalf of Departments. Similarly, the District *e-Mitra* Societies signed MoUs with LSP(s) authorising them to access departmental data and receive payments of bills/dues from the citizen by setting up *e-Mitra* centers/kiosks. The list of services, which were to be provided at *e-Mitra* centers, is given in *Appendix 3.19*. Several other services i.e. Railway and Air reservation, payment of Mobile bills of BSNL and other private players and financial services of private bank (ICICI), etc. are also provided at these kiosks. The

number of transactions carried out by the citizens through *e-Mitra* was as under:

District	Year	No. of Transactions		Amount (Rupees in lakh)
Jaipur	2006-07	Bills	22,64,677	26,090.28
		Applications	45 ⁵⁴	-
	2007-08	Bills	32,33,055	39,693.47
		Applications	20,714	ı
Sawaimadhopur	2006-07	Bills	58,761	324.89
		Applications	Nil	•
	2007-08	Bills	31,110 ⁵⁵	201.67
		Applications	Nil	•

In Jaipur City the services like payment of water, electricity and telephone bills was also available through Internet from 1 December 2007. Only 147 transactions were carried out using this facility and bills of amount Rs 1.45 lakh were deposited up to 31 March 2008.

3.4.3 Audit objectives

The audit objectives were to assess the following:

- * the planning process for the project;
- * convenience, affordability, accessibility and speed of the services provided through *e-Mitra*;
- * the system security –physical and logical; and
- * the monitoring and evaluation of the system.

3.4.4 Audit scope and methodology

The audit was conducted through test check of records of Director, DoIT&C, *e-Mitra* Societies of Jaipur and Sawaimadhopur Districts for the period 2006-08 and verification of the general and application controls operating in the IT environment. Data from the Data Centers of Jaipur and Sawaimadhopur were analysed using Computer Assisted Audit Techniques (CAATs).

An entry conference with Additional Director, Department of Information Technology and Communications was held on 27 February 2008. The observations were discussed with the System Analyst of the Department in September 2008. However, exit conference with the Director of the Department could not materialise.

^{54.} During 2006-07 the service was operational during 31 May 2006 to 8 June 2006 only.

^{55.} The reduction in the number of transactions in Sawaimadhopur was due to non operation of services during 17 July 2007 to 6 November 2007 as LSP (M/s R2R) refused to continue its services.

3.4.5 Technical architecture of e-Mitra

As per the Project Report, *e-Mitra* technical architecture consists of: (i) District *e-Mitra* data center (owned by State Government, operated and managed by a private sector partner as Total Solution Provider (TSP)), (ii) *Lok Mitra* Center (built, owned and operated by private partners as LSP) and (iii) Kiosks (built, owned and operated by individual entrepreneurs through LSPs). DoIT&C has developed the application software for *e-Mitra* project. The duties and responsibilities of different role players is available in *Appendix 3.20*.

The system was using Client Server architecture for *e-Mitra* Centers and Kiosks and Web server architecture for Internet based services. The first tier consists of counter terminals and printers located at *e-Mitra* counters and the second tier consists of web servers and data base servers at Data center. The application software developed by the DoIT&C was on Visual Basic, RMI-Remote Method Invocation (Core Java) with Linux AS-4.2 as operating system and Oracle 10g and MS Access databases. The web portal is on J2EE, Core Java with Oracle 10g data base and Linux (Red Hat) operating software.

3.4.6 Audit Findings

3.4.6.1 Project planning

Project report was prepared without conducting a feasibility study; no URS, SRS and Change Management Policy were prepared.

There was no documented disaster recovery and business continuity plan for the project.

- * The DoIT&C had prepared a project report without conducting a feasibility study. Further, no User Requirement Survey (URS), System Requirement Specifications (SRS) and Change Management Policy were prepared. The DoIT&C carried out the changes in the software as and when requested by the LSPs. There was no prescribed system of receiving change requests, authorising them, testing and acceptance by the users before implementing.
- * There was no documented disaster recovery and business continuity plan for the project. The study of the system at Jaipur revealed that except taking the backup of the data, no other measures like testing for disaster recovery were taken. The CDs containing the backups were also stored in the District Data Centers housing all hardware of the project. In Sawaimadhopur District the LSP did not have adequate facilities for taking the data backup and the backup was taken only at Data center.
- * The security of data and system at the District Data centers was outsourced to private firms. There was no documented password policy prescribing the length of password, pattern and schedule of change and debarring a user on maximum number of wrong entries of password. No log of the changed password was maintained. Further, though error logs were generated by the system there was no record of reviewing the logs and suggesting action on it.

3.4.6.2 Project Implementation

- * The computerisation of the State Government offices (backend) was one of the major components of the project. The information available in the Departments was to be computerised and a data base was to be maintained at each Department, to be updated regularly. The server of the Department was to be linked with the server of District Data Center and the data was to be made available to the kiosks through their respective LSPs. But, the study of the system and analysis of data revealed that out of the integrated services pertaining to Government Departments required to be provided only the services like receiving applications for ration card, caste certificate and income certificates on behalf of Collectorate and collection of water bills of Public Health Engineering Department (PHED), telephone bills of BSNL, electricity bills were actually provided through *e-Mitra* (*Appendix 3.19*). Further, the user Departments were also lagging behind in computerisation.
- * Even the information which was available online was also not available on *e-Mitra* kiosks. For instance, the daily updated rates of commodities in 66 *mandis* in the State were available online on the website of Rajasthan Agriculture Marketing Board but this service was not available on the *e-Mitra* kiosks despite the signing of MoU with the Agriculture Department, depriving the farmers of the information which could help them in getting profitable rates for their agriculture commodities.

Similarly, the information regarding voters' list and status of verification of passport applications was also not available on *e-Mitra* counters which were otherwise available online on respective websites.

- * The LSPs at Jaipur and Sawaimadhopur provided services relating to collection of dues only and none of the LSPs provided application/grievances and public information services. Only the Government run *e-Mitra* center provided the application services at Jaipur.
- * The study of the system revealed that in Jaipur after receiving applications from the citizen, the system captured basic information like name of user, designation office/officer, type of document and enclosures with date and time of receiving it from the user, etc., but once the application was handed over to the concerned Department there was no system to track it. During 2006-08, 20,759 applications relating to ration card, caste certificate and income certificate were received at the kiosk run by the State Government in Jaipur Collectorate campus, out of which only in 9,053 cases the replies were received from the concerned Department(s). There was no follow up for cases where replies were not received.
- * The analysis of the data of PHED bills for the month of May 2008 received by the District *e-Mitra* Society Jaipur revealed that out of 1,56,660 bills amounting to Rs 6.15 crore, payment of only 94,266 (60.17 *per cent*) bills

of Rs 1.71 crore (27.74 *per cent*) was received through *e-Mitra* kiosks which showed that despite setting up kiosks in all major areas of Jaipur city, *e-Mitra* failed to attract all consumers and major portion of the amount was still being collected outside *e-Mitra*. The bills beyond the last date of payment were also not paid at *e-Mitra* kiosks.

3.4.6.3 Arbitrary fixation of user charges

According to the project report the cost of the services was to be borne by the citizen in case of application/grievances and information services and by the Government Departments for payment services on the rates decided by the Government for the services to be provided through *e-Mitra*. The rates of services circulated vide *e-Mitra* Circular 2 dated 4 July 2005, applicable for an initial period of three years were as under:

S.No.	Category of service	Rate in rupees per transaction	To be charged from
1.	Deposition of utility	3.95	Department/Organisation
	bills and Government		concerned
	levies		
2.	Application for	9.00	Applicant
	availing various		
	services		
3.	Public Information	5.00	Applicant
	Service		

The PHED objected to the high collection charges for water bill (PHED was paying Re 0.60 to Rs 1.60 per bill to the Pensioners Society for collection of dues), the DoIT&C had to reduce the charges to Rs 2 for urban area and Re 1 for rural area. But the collection charges remained the same for electricity bills.

Government did not conduct any business study to arrive at the rates to be paid to the LSPs for providing various services. There was no justification available for the rates decided and other modalities.

The Government did not conduct any business study to arrive at the rates to be paid to the LSPs for providing various services. There was no justification available for the rates decided and other modalities. Meanwhile, the Jaipur *Vidyut Vitran Nigam* Ltd. (JVVNL) a partner company of the project had set up its own collection centers in Jaipur City to receive the payment of electricity bills.

Thus, the service of the bill payment through *e-Mitra* was provided without appropriate business study and subjected Departments to pay more on the collection of the bills even though some of them had their own mechanism to collect the bills.

3.4.6.4 Violation of Service Level Agreement (SLA)

In order to ensure continuity and quality of services to the citizen through *e-Mitra* centers/kiosks, the DoIT&C had drafted a Service Level Agreement (SLA) to be executed between the District *e-Mitra* Societies and the selected LSP(s). The Service Levels were categorised as mandatory and desirable with

There was no direct penalty for failing to achieve the optimum level of quantifiable services. corresponding penalty clauses to be invoked in the case of non-fulfillment of the SLA. The analysis of the SLA revealed that there was no direct penalty for failing to achieve the optimum level of quantifiable services like LSP Main center server uptime, LAN uptime, WAN uptime and Kiosk center technical uptime. In the absence of any direct penalty the District *e-Mitra* Society was unable to ensure optimum level of the services delivered by the LSPs.

Analysis of the data relating to 2006-08 revealed the following cases of non-observance of the SLA:

- * As per the MoU signed between the District *e-Mitra* Society, Sawaimadhopur and LSP, the LSP was required to open kiosks both in urban and rural areas of the district in same proportion. The scrutiny of the record revealed that the LSP did not open even a single kiosk in the rural area in Sawaimadhopur District depriving the rural population of the facility.
- * According to the SLA, the LSP's center and kiosks should remain open from 8.00 Hr to 20.00 Hr on normal working days and from 10.00 Hr to 17.00 Hr on holidays/Sundays. Non-adherence to the working hours attracts a penalty of Rs 1,000 for each complaint. The analysis of data revealed that in Jaipur in 45,047 cases the working hours were short of the normal working hours and a penalty of Rs 4.50 crore was recoverable from the defaulter kiosks through the LSP.

Similarly, in Sawaimadhopur District only in 51 cases (out of 1,129) the time schedule was followed.

- * It was seen in Jaipur that in 84 cases, kiosks started operation after 20.00 Hr and remained logged in through out night. This indicated that the kiosks were at their liberty to log on at any time beyond the prescribed time limit posing a serious threat to the security of data and system. This was necessitated by the practice that the kiosks were taking the bills and the amount from the citizens and then calling them again next day to collect the receipt as in 34 cases a sum of Rs 12.82 lakh was shown received after 20.00 Hr. Thus, the very purpose of user's convenience was not achieved.
- * Appendix B of SLA provides that except three National Holidays the *e-Mitra* centers/kiosks will remain open on all working days and public holidays. But the analysis of data revealed that the centers and kiosks did not follow this and many centers/kiosks remained closed on days other than the National Holidays.
- * As per SLA on Hygiene Service Level, the LSP will make necessary arrangement to provide help and guidance to visitors, making sitting arrangement and arrangement of shed and drinking water. It was observed during visits to some of the kiosks in Jaipur and Sawaimadhopur except at two centers run by the Government at Jaipur, none of the centers/kiosks under all three LSPs in Jaipur and the LSP in Sawaimadhopur were providing any facilities enlisted in the SLA. As the centers/kiosks were running in small shops or built in existing shops by putting small cabins, there was not enough space to provide shelter for users standing in queue in front of a small window

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Many centers/ kiosks remained closed on days other than the National Holidays.

The examination of the documents did not show any action initiated by the District *e-Mitra* Societies to inspect the centers/kiosks and make the LSPs to ensure the compliance of the provisions in the SLA.

during hot summer and rains. The examination of the documents did not show any action initiated by the District *e-Mitra* Societies to inspect the centers/kiosks and make the LSPs to ensure the compliance of the provisions in the SLA.

Thus, the District *e-Mitra* societies or the District Collectors did not monitor the functioning of the LSPs leading to deficient services to the citizen.

3.4.6.5 Non-imposition of penalty on account of late deposit of amount collected by the LSP

M/s Easy Bill limited did not deposit the amount collected during May 2007 to March 2008 in prescribed time and a penalty of Rs 1.31 crore was recoverable from the firm.

As per clause five of Non quantifiable Service Levels of Operational Service Level of SLA, all payments received by the LSP were to be deposited within 24 hours of the days' business failing which penalty of one *per cent* of collected amount per day was to be levied for delays upto three days. For delay of more than three days legal action was to be taken against defaulting LSP. It was observed during the scrutiny of the record of *e-Mitra* Society, Jaipur that M/s Easy Bill limited did not deposit the amount collected during May 2007 to March 2008 in prescribed time and a penalty of Rs 1.31 crore was recoverable from the firm. As the firm took more than three days in depositing the payment in the Government Account, the Chairman, District *e-Mitra* Society, Jaipur decided (January 2008) not to extend the term of the firm beyond March 2008. Despite serving of a notice to the firm to terminate it's services from 1 April 2008, the contract of the firm was extended upto June 2008. No legal action had been taken against the firm.

3.4.6.6 Non-imposition of penalty for late despatch/receipt of documents

As per a clause of Non quantifiable Service Levels under Operational Service Levels of the SLA the documents (applications/grievances) have to be despatched/received (in one go) to the District *e-Mitra* Society office before 4.30 PM of the next business day. If delayed beyond two business days, penalty of Rs 1,000 per day of delay was to be levied from the LSP. But the analysis of the data of Jaipur District for the period 2006-08 revealed that the field meant for recording the date of despatch was not made mandatory and was left blank in all 20,759 cases. It was also seen that all 20,759 transactions were carried out at the kiosk number one and three run by the Government. Thus, no penalty was imposed by the District *e-Mitra* Society for late despatch/receipt of documents. Audit was not able to ascertain the delay in absence of relevant data in the data base.

3.4.6.7 Non-utilisation of hardware

The District *e-Mitra* Society Sawaimadhopur purchased (November 2005) hardware costing Rs 16.83 lakh to establish *e-Mitra* District Data Center. Out of the hardware procured, server, computers, peripherals and accessories worth Rs 6.34 lakh were lying unutilised. The DoIT&C also sent (November 2006) two servers valued Rs 8.83 lakh for District Data Center, which were also lying unutilised (July 2008). Thus, hardware worth Rs 0.15 crore was not put to use.

3.4.6.8 Monitoring and Training

- * The *e-Mitra* Society officials were required to visit the LSP/kiosks once in a month to collect the complaints and take remedial action to ensure quality services. But the scrutiny of the record revealed that no visits of LSP/kiosks was made by District *e-Mitra* Societies, resulting into non-redressal of complaints.
- * DoIT&C paid an amount of Rs 3 lakh to District *e-Mitra* Society, Sawaimadhopur for imparting basic training to the staff of backend offices (Government Departments) under *e-Mitra* project. In turn, District *e-Mitra* Society paid entire amount to Ranthambore Science College to conduct a computer awareness course. The college conducted 15-day-long courses during March 2006 to June 2006 for the 265 staff of various Departments. As none of the offices located at Sawaimadhopur was computerised (July 2008), the expenditure on training was unfruitful.

3.4.7 Conclusion

Though the *e-Mitra* project was launched to provide a large number of services to the citizens on one stop basis, it suffered from inefficient and ineffective implementation as many of the participating Departments were not fully prepared to implement it. The project resulted in centers being run as mere bill collection points and that too not effectively. However, they were not providing requisite services relating to collection of application and grievances to the citizen. Even the services provided were deficient in view of the untimely offs, non working of the *e-Mitra* kiosks even on the days other than the national holidays, non-provision of hygiene facilities at the kiosks. They were also not providing one stop service to the citizen and were making them make one more trip to the center to collect receipts. The Government extended undue benefits to the private players by not imposing the penalties for violation of provisions of the agreement. There was no disaster management, change management or monitoring and supervision mechanism in place to ensure the envisaged services to the citizen.

3.4.8 Recommendations

- * All intended services should be provided through the *e-Mitra* Kiosks.
- * It should be ensured that even private kiosks also provide most of the frequently demanded services
- * All backend offices should be computerised and all relevant information should be digitised.
- * The forms for various applications and grievances should be standardised and available in electronic format. Instead of collecting applications and

- grievances on paper from citizen, the same may be submitted online, to be forwarded to the concerned officer in the Department on the same day.
- * The District *e-Mitra* Societies should inspect LSPs/Kiosks on regular basis to make sure that appropriate services are provided by the LSPs/Kiosks.
- * Evaluation should be conducted by the State Government to assess the benefits accruing to the public and steps needed for effective use of *e-Mitra* Project in e-governance.

APPENDIX-3.19

(Refer paragraphs 3.4.2 and 3.4.6.2; page 88 and 91)

Services of different Departments to be provided at e-Mitra

S. No.	Department	Service
1.	Collectorate	
1.1		Bonafide Certificate (Urban)
1.2		Bonafide Certificate (Rural)
1.3		Marriage Certificate
1.4		Ration Card
1.5		Name addition / Deletion / Correction in Voter List
1.6		New / Old Jamabandi
1.7		Application to open Mutation
1.8		Relief against accidental death / Wounded
1.9		Relief against fire case
1.10		Relief against heavy rainfall
1.11		Sanction amount from CM relief fund
1.12		Pension for old age / widow / physical handicap
1.13		Procedure of tree cutting Permission
1.14		Income Certificate
1.15		Character Certificate by Police
1.16		Caste Certificate
1.17		Allotment of Land for Public use
1.18		Gair-Khatedar to Khatedar
1.19		Demarcation
1.20		Conversion of agriculture land
2.	Zila Parishad/DRDA	
2.1		Loan sanction under Swarn Jayanti Gram Swarojgar Yojana
3.	Transport	
3.1		Driving Learner License
3.2		Permanent License
3.3		Renewal of License
3.4		Duplicate License
4.	Jaipur Municipal Corporation	
4.1		House Tax Deposition
4.2		Payment of Lease Money
4.3		Birth and Death Registration

S. No.	Department	Service
4.4		Rent for Hoardings
4.5		Hotel License
4.6		Grievances for Dead and Stray Animals
4.7		Grievances for Street Light
4.8		Grievances for Sewerage Line
5.	RSRTC	
5.1		Issue of Bus Passes
6.	PHED	
6.1		New Connection
6.2		Meter Change
6.3		Complaint Regarding Billing Issue
7.	Registration and Stamps	
7.1		Document Registration
7.2		Copy of Documents
7.3		Inspection & Search
7.4		License to stamp vendor & deed writer
8.	DISCOM	
8.1		New Connection
8.2		Meter Change
8.3		Complaint Regarding Billing Issue
9.	Rajasthan Housing Board	
9.1		No Dues Certificate
9.2		Transfer of Name
9.3		Change in Registration Details
9.4		payments of Dues under various heads
10.	Agriculture Department	
10.1		Mandi Rates
11.	Medical	
11.1		Pulse Polio
12.	Seeds Corporation	
12.1		Details/Sale of seeds
13.	Horticulture Department	
13.1		Details of Nurseries

APPENDIX-3.20

(Refer paragraph 3.4.5; page 90)

Duties and Responsibilities of different role players

S.No.	Role player	Re	lationship
1.	District e-Mitra Society	-	Main owner and driver of e-Mitra project in a
			district
		-	Appointing authority of LSP
		-	Will sign the SLA with the LSP
		-	Will coordinate and monitor the functioning of LSP
		l _	Will be the owner of <i>e-Mitra</i> 's main bank
			account. LSP will deposit all cash/cheques
			collected from citizens in this account. Society
			will thereafter forward the amount due to the
			concerned department.
		-	Can inspect LSP's centers and authorised kiosks
		-	Will issue guidelines for publicity material,
			uniform of LSP's counter personnel, etc. Will vet all MIS reports generated by the LSP
2.	District Administration	+-	District Collector will be the chairperson of
	2 - SULLEVI AMILIANDE MUVII		e-Mitra Society
		-	Will identify and provide space for Lok Mitra
			Centers in Government owned premises
		-	Will allow and finalise conditions in case LSP
			wants to open <i>Lok Mitra</i> Center at any place other
			than Government building Will address all issues related to grievance
		-	redressal
3.	Participating Departments	-	Will provide base information in the form of
	a range area		printed manual data and in electronic format like
			master files, forms, procedures, etc.
		-	LSP has to reconcile accounts with the
			participating departments
		-	LSP will send the applications and related documents to the concerned participating
			department and follow up for any action required
		-	Will ensure timely disposal of cases referred
4.	Department of Information	-	Main trustee of the <i>e-Mitra</i> project
	Technology and	-	Developer of the e-Mitra application software
	Communication		including database structures
		-	In case of any modification/enhancement required
			in <i>e-Mitra</i> application software, LSP will request <i>e-Mitra</i> Society which in turn will forward the
			same to DoIT&C.
5.	e-Mitra Data Center	-	Main hub for recording of all electronic
			transactions
		-	LSP's centers and authorised kiosks will hook on
			to the e-Mitra Data Center through appropriate
			medium for all transactions, data transmission,
			generation of MIS

S.No.	Role player	Relationship
		 All logins, passwords, authorisations for LSP and for its authorised counters will be maintained at <i>e-Mitra</i> Data Centers. <i>E-Mitra</i> Data Center will be under the control of district collector and will be governed by the policies laid out by DoIT&C.
6.	Counters (Lok Mitra	- Owned or authorised by LSP
	Centers/Jan Mitra kiosks)	- Will be set up by LSP or local entrepreneurs
		selected and authorised by the LSP
		- LSP will be accountable for working of its
		authorised counters in terms of SLA, security of
		financial transactions, document receipt and
		transmission, etc.