



OFFICE OF THE MINORITY LEADER

Parliament House - Accra (Ghana)

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My Ref No.....

Your Ref No.....

Telephone: +233 302 663 325

Fax: +233 302 663 325

Tuesday 18th May 2021

To: ALL MEDIA HOUSES

[Parliament House, Accra]

My attention has been drawn to comments made by Dr. Mahmoud Bawumia, Vice President of the Republic of Ghana, on a mandatory SIM re-registration within June. He made these comments at the Ghana CEOs award ceremony. He proceeded to claim that failure to re-register would amount to the deactivation of your SIM card and the resultant inability for the subscriber to access telecommunication services including Mobile Money transactions. He indicated that the sole documentation for the re-registration exercise would be the Ghana Card.

The comments of the Vice President are unfortunately ill-informed, inept and highly naïve. The solution to the challenges of fraud within the electronic money ecosystem goes beyond sim registration. Ordinarily and in the past, the fiery display of ignorance by the vice president about digital evolution and emanating operational controls has received no attention. However, we are forced to react to this display of ineptitude by the Vice President because of the likely adverse consequences from oversimplifying a growing challenge with transformational technology. Suppose the Vice Presidents false beliefs about the root cause of electronic money fraud are allowed to garner momentum in serving his narrow political aims. In that case, it distracts from well thought out and proven solutions that can help mitigate this challenge and propel improved livelihoods.

We hold the view that mandatory re-registration of SIMs provides no substantial benefit in the fight against electronic money fraud and will face practical challenges such as with inbound travelers who require a sim card without a national ID.

1. Firstly, this process would deprive a large segment of the users of Mobile Money services from accessing the service due to no fault of theirs without necessarily eliminating the current challenges Mobile money faces.
2. Secondly, a key area of electronic money fraud relates to the attacks on mobile money vendors. Re-registration of SIMS does not significantly mitigate this risk.
3. The suggestion that only the Ghana card would be accepted as an identification document during the supposed registration exercise is indeed problematic because such a singular identification method risks alienating a massive section of the society. The number of issued cards is only a pale shadow of the eligible population. The reality is that there have been only 17 million registrations done of the Ghana Card. This represents about 55% of our population. An even smaller proportion of the population has actually received their cards. It needs no saying, therefore, the practical difficulties associated with a card that is facing systematic and operational difficulties in its rollout.
4. While we are hopeful of the potential of a nationwide identification system, we are not oblivious to its inherent challenges. Inherently, the information provided by registrants during the acquisition of the Ghana Card is self-provided without any meaningful independent verification process. It is not far-fetched to expect dubious characters to attempt gaming the system with falsified information from inception. This means that dubious characters will not be significantly inhibited by a re-registration system. It is also critical to note that the National ID does not hold real-time data about key anti-fraud information such as changes in perpetrators residency.
5. The timelines are also ambitious if one considers the matters arising from a pandemic and the need to prioritize human safety. This is an important element, especially as it has a direct bearing on the cost of the project. If this project is, for instance, phased out in a sensible manner and over an extended period, it reduces the CAPEX requirements and other administrative costs.
6. Also, the corridor discussions about the lack of transparency of this deal, including supposed persons who are to implement it, are not helpful. Government, if it decides to pursue this project against our well-intentioned advice, must commit to transparency and full disclosure.

It is our considered opinion that if Dr. Bawumia feels the urge and pressure to justify the massive expenditure on a national ID system with extended use, our suggestion will be for him to adopt a pragmatic approach in the circumstance.

1. The ID cards used for initial registration all have expiry dates and would require periodic updating. Telcos can be asked to activate the requirement for IDs to remain valid and unexpired at all times, similar to the approach adopted by banks.
2. If the Vice President really desires simple solutions, he should consider instructing the BOG and NCA to set key performance indicators for the mobile network operators (MNOs) about electronic money fraud and with consequences for breaches.
3. The Vice President should urge subtly or overtly the MNOs to invest - proportionate to market share - in advanced cybersecurity tools for fraud detection and mitigation, enhanced public sensitization campaigns and monitoring systems, including additional personnel. These have been known to achieve monumental success stories in other jurisdictions with similar ecosystems.
4. The timelines for roll-out need to be made more pragmatic to allow for the convenience of customers as well as achieve minimal capital outlay and optimal utilization of investments made.

It is important to note that no country globally has achieved any phenomenal operational and system improvement with sim registration. On the contrary, it has only served other purposes in 'policed states' with draconian regimes. When organizations such as Facebook were faced with similar issues with their systems and operations, their governments did not impose unnecessary registration systems. They rather encouraged and mandated these organizations to spend on modern monitoring systems and hire more people to curb the menace. This approach yielded more dividend than the current intended approach.

Perhaps the Vice President is out of touch with reality about the emerging dynamics of digital footprints or may have shot above his weight, or perhaps he is assuming a responsibility that he cannot comprehend fully. Whichever it is, it is overly simplistic for anyone well versed in system controls and digital footprints to assume that mere identification or re-registration can be the fundamental cornerstone to solving the issues of fraud and identity theft bedeviling the sector. Invariably this re-registration exercise at best would be another cumbersome bureaucratic burden imposed on the citizenry, with a huge cost to the MNOs, and without consideration of sensible viable alternative control systems.

It is clear that Dr Bawumia is naïve, clueless and largely incompetent on technology issues, and this has been established with his previous attempts to assume that national issues have very simplistic, almost thoughtless points of action and solutions. His track record with the 'Jack where are you GPS' that has yielded no real benefit to the economy save for those involved in the rollout; to the raucous claims of enormous increases in revenue from a revenue assurance mechanism that has shown no real success story as promised; or prosecution of the MNOs accused of under declaration of revenue; to his misunderstanding and misconception on the cost and utility of the interoperability system which has even deepened the lopsided nature of the market share in favour of one MNO. Our Vice President must hasten slowly and appreciate the inherent complexity and contextual variables in professing solutions to national issues.

It is difficult to sympathize with Dr. Bawumia, though, as he is the architect of his doom and evidently has not learned his lessons.

SIGNED
MINORITY COMMUNICATIONS CAUCUS

Editors Note

Hon. Samuel Nartey George would be available for further conversation on the subject matter. We would be grateful if you contacted him on 0249241251 for follow up media engagements.