Data management Systems Sectional committee LITD 15 - Comment/Feedbacl on proposed standard ISON

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To "Data management Systems Sectional committee LITD fifteen" <ltd15@bis.gov.in>

Cc "Jyoti Kushwaha" <jkushwaha@bis.gov.in>

Dear Sir/Madam

Attention : Ms. Jyoti Kushwaha

PFA the comment on the Proposal for Standardizing Data – International/Indian Standard Organization Number (ISON).

We can seek feedback from members and circulate the consolidated feedback.

Regards
Ramesh Radhakrishnan

---- On Fri, 24 May 2024 10:09:54 +0530 **Data management Systems Sectional committee LITD fifteen <ltd15@bis.gov.in>** wrote ---

Dear Sir/Madam,

This has reference to the discussion held in the last meeting of LITD 15 held earlier this year regarding registration of experts in various international working groups and cooption(onboarding) of new committee members. In this regard, please find attached the following:

1. A brief write up regarding LITD 15, its international liaisons (ISO/IEC JTC1/SC 22, ISO/IEC JTC1/SC 32, ISO/IEC JTC1/SC 34 and their working groups)
2. List of projects under development/ballot in these Working Groups(WGs) as of date. **(Annex A)**
3. List of existing registered members in the said international Working Groups (WGs). (Annex B)

It was emphasized during the meeting that we should have at least one or two Indian experts in every working group to ensure effective participation in each related domain such as COBOL, PASCAL, ADA, C, C++ etc.
Hence, **All members are requested to:**

1. Either send your own name as nomination for registration as an expert based on your area of expertise. Kindly mention at least one project out of Annex A along with your nomination.
2. Or identify and suggest new members for co-option in LITD 15 based on their area of expertise.

Additionally, Members who are already registered as experts are specifically requested to identify and inform at least one project from this list in which they would be contributing as an expert latest by 28th May 2024.
Any other New work items or expected proposals being discussed in respective WG(not listed in Annex A) may also be informed by Experts participating in Working Group meetings. No response from registered experts would be assumed as no interest to contribute and accordingly further actions would be initiated. It is informed that that based on the inputs received, membership would be reviewed, including registration of members as experts, in consultation with the LITD 15 Chairperson.
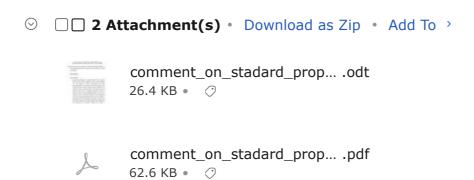
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Thanks and Regards/ सादर
Jyoti Kushwaha/ ज्योति कुशवाहा
Scientist-D & Joint Director/वैज्ञानिक 'डी' एवं संयुक्त निदेशक

Electronics & IT Department/इलैक्ट्रॉनिक्स एवं सूचना प्रौद्योगिकी विभाग
Bureau of Indian Standards/ भारतीय मानक ब्यूरो

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Comment on the Proposal for Standardising Data – International/Indian Standard Organization Number (ISON)

The proposal has envisaged allocation of Standard Organizational Number so that analytics/data processing is simplified when data is drawn from multiple organizations.

National Scenario

Number Allocation

◆ Organizations/Individuals are assigned Statutory Unique Identifiers (SUI) by various Statutory Organizations (SO) and capture attributes that are suitable to them, commensurate with their objective/jurisdiction. Service Providers also assign identifiers to their consumers and some of them use mobile numbers as identifiers. The assignment of these numbers depends on the purpose and type of services offered. Some are perpetually mapped and cannot be changed, but permit to change attributes/properties, while others are used for short term. Some have the restriction of only one identifier be issued to an organization/individual while others can be multiple. So the identifiers per se requires different interpretation, usage, purpose and life time. Certainly using a Single Identifier may be detrimental to this requirement. All information collected from entities (Oragnziations/individuals) are to be protected as required by rules, regulations and guidelines by various SO.

Sharing/Linking Data

◆ SOs may share data based on the Legal Statutory requirement. Similarly Service Oragnizatiosn share information as required by regulations and with due consent of the individuals wherever required.

◆ Consumers are required to provide KYC while availing services from various Service Organizations. Organization assign Unique Identifiers (UI) and link Statutory Unique Identifiers (SUI) that they are required to keep. This mapping in a simplified version typically looks similar to the following

UI (Service Identifier)	PAN	Voter-Id	Aadhaar No	Other attributes
Bank Account Number	XXXXXXXXXX			

Patient Identifier/Unique Health Identifier		<Voter-Id>		
Driver License Number			Aadhaar-No	

- ◆ Statutory identifiers can be used to track an individual/organization with the UI issued by Service Organization. For example a Bank account number is linked to PAN, A Patient Identifier or Unique Health Identifier issued by a Hospital may be linked to Aadhaar Number/Voter-ID. A Driving Licence may be linked to any one of PAN, Aadhaar or voter-id.

Processing Data

(a) When companies are merged SI linked in the data across company databases can be used to tag individuals / Organizations. One of the SI can be intersected to tag/identify an individual/Organization (mostly PAN or GSTIN for Companies)

(b) The Company operating multiple Data Bases ensure the same algorithm for allocation or add records with old allocated numbers

(c) Data analytics usually summarize data in aggregates rather than profiling individuals/Organizations. However for investigation purposes data from different sources can be intersected using SI wherever available/possible.

Summary

- ◆ Clarity on the following are required.
  a) How are the Standard Organizational Number allotted? The structure and semantics.
  b) Who has to setup & operate the common registry? what attributes are to be captured?
  c) How it will be shared & verified?
  d) The governance structure and body.
  e) How is the existing DB updated? modified? time-frame, etc.
- ◆ Secondly, there should be a legal framework for allocation of Standard Organizational Number as proposed.
- ◆ A standard process cannot be suggested and enforced without a legal requirement.

- ◆ In Summary, at present the proposal is not possible to be taken up as standard as there are Practical,Governance and Legal concerns. In the absence of the framework, the adoption of the standard will be impacted.