



INDEPENDENT JOINT ANTI-CORRUPTION
MONITORING AND EVALUATION COMMITTEE

MEC MONITORING OF MINISTRY ANTI-CORRUPTION PLANS

**MINISTRY OF COMMUNICATION, INFORMATION &
TECHNOLOGY**



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ACRONYMS

MCIT	Ministry of Communication, Information and Technology
USAID	United States Agency for International Development
RTDMS	Real Time Data Management System
MoF	Ministry of Finance
ACP	Anti-Corruption Plan
MEC	Monitoring and Evaluation Committee
Moi	Ministry of Interior
ATRA	Afghanistan Telecom Regulatory Authority
IARCSC	Independent Administrative Reform and Civil Servants Commission
NUG	National Unity Government
M&E	Monitoring and Evaluation

EXECUTIVE SUMMARY

During the year 2016, The Ministry of Communication, Information and Technology committed to implementing an Anti-Corruption Plan. Almost all Ministries have developed such plans. MEC is carrying out reviews of these Ministry plans, and is reporting here on its first review of the Ministry of Communication, Information and Technology (MCIT) Anti-Corruption plan.

MEC's finding is that MCIT is so far almost entirely failing to implement its Anti-Corruption Plan.

The MCIT plan contains four priority action areas, and MEC findings in each are summarised below:

TRANSPARENT COLLECTION AND MANAGEMENT OF REVENUES IN TELECOMMUNICATION SECTOR

At present, telecommunication companies collect 10 percent users' fee from mobile phone users.¹ However, MCIT still cannot verify if the amount deposited into its account represents the actual collection of 10 percent users' fee. Part of the reason is disagreements related to the installation of an IT system RTDMS. This is delayed, including tensions between the two ministries over which institution is exactly authorized to do the procurement.

At this stage, it is almost impossible for the staff of MCIT to determine if the manual reports of private telecommunication companies represent the actual amount of tax.

ENHANCEMENT OF ELECTRONIC GOVERNANCE SERVICES

E-government Directorate of the Ministry of Communication, Information and Technology was expected to study if it is feasible to make all administrative procedures of government electronic to bring transparency, effectiveness and equitable access to public services.

To achieve the first indicator of Anti-Corruption Plan, the E-government Directorate assigned a technical team to draft an e-government services plan listing 10 public services that shall be automated during the next 3 years. The deadline for the feasibility study has been set to be May 2017 but MCIT has not yet even started choosing any company to conduct the study. The Presidential Palace has assigned the head of E-Government Directorate to only prioritize Procurement, Driving-License and Visa services saying that is not realistic to study all systems simultaneously.²

Even if MCIT had launched the study, it could not have completed it even by the end of 2017. The E-government Directorate of the Ministry failed to figure out which services should be prioritized first due to lack of consultations with experts, donors and other government officials.

HIRING COMPETENT PEOPLE AND INTRODUCING ORGANIZATIONAL REFORM

Human Resource Directorate of the Ministry of Communication, Information and Technology states that it has reviewed the Tashkeel of MCIT by November 2016. The main purpose to review the Tashkeel was planned to improve the Tashkeel and prevent overlap of positions. However, according to a letter, MEC has received from the HR and Tashkeel Department of MCIT; the Tashkeel was not substantially reviewed and no effective changes have been proposed. The staff of Planning and Policy

¹ Procedure for collecting of 10 percent users' fee

² Interview with E-Government Directorate of MCIT, Kabul, January 5, 2017.

Directorate of MCIT confirmed to MEC that there is still no Monitoring and Evaluation Unit in the ministry.³ Thus, the entire Tashkeel is outdated. In the meantime, the leadership of the Ministry did not hire any expert to review and propose

RAISING PUBLIC AWARENESS

Previously, complaints of consumers were filed only through phone conversations in the Ministry of Communication, Information and Technology. However, Afghanistan Telecom Regulatory Authority (ATRA) has assessed, designed and launched a web-based system for receiving public complaints ahead of the deadline that was set for the establishment of such a system in MCIT's annual Anti-Corruption Plan. To assess the effectiveness of the system, the MEC assessment team has sent a test-complaint through the website. ATRA confirmed to the team the receipt of its complaint and promised to follow it up. This web-based complaint system was launched a month ago. So far, 55 public complaints have been received by ATRA.

This is positive progress, though the complaints system is not yet reaching large number so users.

CONCLUSIONS

MEC has observed several reasons behind the overall failure so far to implement the plan. The lack of genuine commitment among top-level managers inside MCIT is the number one factor. Establishment of modern systems to ensure transparent collection of revenue is viewed as an impediment to illicit source of incomes of corrupt officials. Continued political interventions and nepotism in the recruitment process are other key reasons that have inhibited the presence of qualified young Afghans in this ministry.

The impact of the failure to prevent and combat corruption in MCIT has been huge nationally, particularly on collection and increment of revenue. MCIT's failure to properly achieve ACP has circumscribed the ability of the National Unity Government, for instance, to collect the 10 percent tax that is deducted by private telecommunication companies from mobile phone users. Lack of a massive crackdown on illegal SIM Boxes inflicts revenue damage too to wireless operators.

In addition, complicated organizational Tashkeel and absence of a merit-based recruitment process are the second major reason why MCIT has not made more progress in implementing the Anti-Corruption Plan. The recruitment process of the Ministry of Communication, Information and Technology is weak. For example, just recently, several vacancies have been announced by the HR Directorate notwithstanding the fact that the hiring process remains unchanged and vulnerable to interventions and nepotism. On the positive side, notwithstanding the fact that MCIT did not accomplish its major anti-corruption priorities, public complaints are received, investigated and addressed. This achievement has been attained after proper systems were put in place. Therefore, most of the operations of this revenue generating ministry are still seriously plagued by rampant corruption and inefficiencies. The staff of MCIT has acknowledged that prompt decisions are urgently required to expedite the procurement of RTDMS and establishment of Fraud Management Systems to bring transparency in collection and increment of revenues.

³ Group discussion with the staff of Planning and Policy Directorate of MCIT, Kabul, January 26, 2017.

RECOMMENDATIONS

NO.	RECOMMENDATION
Leadership	
	MCIT leadership should review what are the reasons for the lack of commitment to tackling corruption, and take action accordingly
	MCIT should state publicly what they commit to achieving against corruption within the next three months and six months
Regarding priority 1: Increase Transparency In The Collection of Telecom Revenue	
	High Economic Council should assign either MoE to immediately purchase Real Time Data Management.
	The Expression of Interest for the procurement of RTDMS should be advertised
	Funding for procurement of Fraud Management System should be requested from donors including World Bank and USAID
Regarding priority 2: Enhancement of Electronic Government Services	
	Contract should be signed with a company for feasibility study of e-visa, e-procurement and e-driving license.
	E-Governance Directorate of MCIT should consult with experts and donors about the implementation of the feasibility study
Regarding Priority 3: HIRING COMPETENT PEOPLE AND INTRODUCING ORGANIZATIONAL REFORM	
	The HR and Tashkeel Department of MCIT should hire qualified experts to review the Tashkeel and propose changes.
	The HR Directorate of MCIT needs to design, develop and implement a transparent recruitment procedure for the appointment of administrative and technical staff based on merit and competition. Appointments in the ministry should be closely monitored and evaluated by the M & E Directorate and Independent Administrative Reform and Civil Servants Commission.
	Test Questions should be made right on the day of written test
Regarding priority 4: RAISING PUBLIC AWARENESS	
	MCIT's Data-Center should be upgraded
	Public awareness programs about Afghanistan Portal should be launched through social media, billboards, and television
	Qualified experts should be hired to develop the content of the portal
	E-Signature law should be drafted and sent to the parliament for approval
	ATRA should hire 8 more operators to work in night shift and receive public complaints.
	ATRA should launch public awareness programs about its web-based complaint system through social media, billboards and television

INTRODUCTION

ANTI CORRUPTION PLAN OF THE MINISTRY OF COMMUNICATION, INFORMATION AND TECHNOLOGY (MCIT)

MCIT is one of the five key revenue generating ministries of the Islamic Republic of Afghanistan that prepared its Anti-Corruption Plan in 2015 and was supposed to begin implementation of it by the first half of 2016. *“MCIT generates around \$ 150-\$200 million annually from 10 % Business Receive Tax (BRT), 20 percent Income Tax, 20 % holder tax (collection from shareholders net profit), which goes direct to the account of Ministry of Finance account, 2,5 % Telecommunication Development Fund (TDF) fee and licensing fees”*.⁴

However, the process of collection and growth of revenue inside MCIT is not transparent to a great extent due to existence of many vulnerabilities of corruption. Thus, to curb corruption in general and ensure transparency in the collection and increment of revenues, MCIT has listed to implement the following four priorities in its Anti-Corruption Plan.⁵

- I. TRANSPARENCY IN COLLECTION AND MANAGEMENT OF REVENUES FROM TELECOMMUNICATION SECTOR**

- II. ENHANCEMENT OF ELECTRONIC GOVERNANCE SERVICES**
- III. HIRING COMPETENT PEOPLE THROUGH TRANSPARENT PROCESS AND INTRODUCING ORGANIZATIONAL REFORMS**

- IV. RAISING PUBLIC AWARENES**

METHODOLOGY

The review of Anti-Corruption Plan (ACP) of the Ministry of Communication, Information and Technology (MCIT) was proposed to determine the progress inside the ministry as regards to the implementation of ACP. To systematically assess the indicators of the plan, the assessment team has initially conducted a desk research, collected policies, procedures and the strategic plan of MCIT and ACP and studied them one by one.

Subsequently, information regarding the indicators listed in the Anti-Corruption Plan was gathered through Key informant/ in-dept interviews, focus group discussions and document reviews and analysis.

For this report, MEC conducted face-to face interviews with the acting minister and administrative deputy minister as well as officials in MCIT directorates including Finance and Procurement, Afghanistan Telecom Regulatory Authority (ATRA), E-Governance, Human Resource, Planning and

⁴ Anti-Corruption Plan of MCIT, 2016, page 1.

⁵ Anti-Corruption Plan of MCIT, 2016, page 2.

Policy. The assessment team also conducted focus group discussions with mid-level and low-level staff of the Ministry of Communication, Information and Technology in related directorates. The team also met with other entities involved in the sector. The field assessment was followed by a detailed review and analysis of the documents gathered to verify the descriptions and arguments revealed by the participants in interviews and focus group discussions.

The report was subsequently shared with the Members of MEC and related government officials to seek their comments about the feasibility and accuracy of the recommendations.

FINDINGS

In the following sections, this paper assesses whether or not MCIT has achieved the indicators listed in the plan and that analyzes the activities based on the evidences collected and interviews conducted.

I. TRANSPARENT COLLECTION AND MANAGEMENT OF REVENUES IN TELECOMMUNICATION SECTOR

OBJECTIVE	ACTIVITY 1	BASELINE	INDICATOR
Increase Transparency In The Collection of Telecom Revenue	Establishment of Real Time Data Management System for the collection of 10 % user fee from mobile phone users	Current, MCIT relies on manual reporting from telecom companies. Therefore, MCIT is unable to verify the actual amount of fees being collected.	Concept paper for the Real Time Data Management System is completed to define the scope and cost for the system.
			System specifications and requirements are identified
			Transparent and competitive procurement process is completed

FINDING:

At present, telecommunication companies collect 10 percent users' fee from mobile phone users.⁶ The companies report manually to the Ministry of Communication, Information and Technology (MCIT), Afghanistan Telecom Regulatory Authority (ATRA) and Ministry of Finance.⁷ Nevertheless, these institutions have no system to verify the exact amount of fee that is collected. Telecom companies (Roshan, Afghan Wireless,

⁶ Procedure for collecting of 10 percent users' fee

⁷ Interview Finance and Accounting Directorate of MCIT, Kabul, December 25, 2016.

MTN, Etisalat, Afghan Telecom and Wasel Telecom) deposit the collected users' fee in the account number 1213321 in Afghanistan Bank. From September 2015 to November 2016, 5,123,144,044 AFS have been deposited into the account of MCIT.⁸

However, MCIT still cannot verify if the amount deposited into its account represents the actual collection of 10 percent users' fee due to unavailability of REAL TIME DATA MANAGEMENT SYSTEM (RTDMS).⁹ Therefore, many respondents have reiterated that non-availability of RTDMS has kept collection of the revenue vulnerable to corruption.

RTDMS would facilitate direct access of MCIT to information of individuals including phone numbers and exact amount of tax deducted. The deadline for the establishment of RTDMS has been set to be June 2017 in MCIT's annual Anti-Corruption Plan. The concept paper and specification of the system have been completed.¹⁰ The system has to be purchased by June 2017. The President of Islamic Republic of Afghanistan has set up a committee chaired by the Minister of Economy to speed up the establishment of REAL TIME DATE MANAGEMENT SYSTEM.¹¹ MCIT is responsible to address technical issues of the process. The procurement has been decided to be conducted by Ministry of Economy. Now, according to respondents, tensions are palpable between the two ministries over which institution is exactly authorized to do the procurement.¹²

Ministry of Communication, Information and Technology argues that the procurement of the system should be led by MCIT itself since the cost is incurred from its own budget. Therefore, EXPRESION OF INTEREST has not been advertised yet. In the meantime, respondents alleged that telecommunication companies have repeatedly bribed key officials of MCIT not to purchase RTDMS. Respondents went further saying that officials in MCIT do not want to install the system because it would block their source of illegal income.¹³ Based on the Anti-Corruption Plan of MCIT, intervention of telecommunication companies and lack of funding have been noted as two key risks. But funding is available now. MCIT has \$ 2 million budget available for the procurement of RTDMS.

The government of Afghanistan needs to expedite the procurement of Real Time Data Management System (RTDMS) because the more it is delayed, the more it would adverse impact it would have on the collection of 10 percent tax of users' fee. At this stage, it is almost impossible for the staff of MCIT to determine if the manual reports of private telecommunication companies represent the actual amount of tax. Establishment of RTDMS would ensure transparency and accountability to the process of

⁸ Ibid

⁹ Interview with Technical Deputy Minister of MCIT, Kabul, December 27, 2016.

¹⁰ Specifications of RTDM, ATRA, December 28, 2016.

¹¹ Decision of High Economic Council of Afghanistan, Kabul, December 28, 2016.

¹² Interview with Procurement Department of MCIT, Kabul, January 5, 2017.

¹³ Interview with mid-level managers of MCIT, Kabul, December 27, 2016.

collection of revenues in the Ministry of Communication, Information and Technology.¹⁴

OBJECTIVE	ACTIVITY 2	BASELINE	INDICATOR
Increase Transparency In The Collection of Telecom Revenue	Establishing a Fraud Management System	Private companies have their own Fraud Management and that they send manual reports to ATRA.	Technical needs assessment and system design are completed
			Transparent and competitive procurement process is completed

FINDING:

The Anti-Corruption Plan of MCIT requires ATRA (Control and Monitoring Department) to set up a Fraud Management System for ARTA by June 2017/Sept 2017 to identify illegal SIM Boxes across Afghanistan. SIM BOX is a device that contains SIM cards of different telecommunication companies bypass rates and undercut prices charged by mobile phone operators.

Since the Afghan state imposes tax on telecom services, the government continues to lose tax revenue when calls are illegally bypassed by illegal SIM Boxes.¹⁵ These SIM boxes are also causing major revenue damage to wireless operators in Afghanistan.¹⁶

The damage is inflicted due to absence of Fraud Management systems inside MCIT. Private mobile phone companies operating in Afghanistan own the system but they cannot cover the whole country.¹⁷ Based on ACP, ATRA was supposed to set up a Fraud Management System and identify illegal SIM Boxes. However, ATRA could not achieve the plan because it needed \$ 10 million dollars to procure and develop the system.¹⁸ To mitigate the risk, ATRA is planning to grant license to two foreign companies to identify SIM Boxes. These companies have applied for license. ATRA has permitted them to their operations temporarily until their applications for license are reviewed.¹⁹

¹⁴ Information Technology Experts, Kabul, January 6th, 2017.

¹⁵ Interview with Technical Deputy Minister of MCIT, Kabul, December 27, 2016.

¹⁶ Interview with Technical Manager of Roshan, Kabul, January 3rd, 2017.

¹⁷ Interview with Planning and Policy Directorate of MCIT, Kabul, January 31, 2017.

¹⁸ Interview with ATRA, Kabul, December 27' 2016.

¹⁹ Ibid

Over the past 3 months, 19 illegal SIM Boxes have been detected by joint operations of ATRA-led companies and telecommunication companies' fraud management systems.

According to interviewees, ATRA is faced with two risks to prevent SIM boxes. Firstly, perpetrators are routinely released after they bribe the police, while they are in custody.

Secondly, powerful figures in the country are also involved in this notorious business. In an attempt to somewhat address the second challenge, ATRA does not reveal the exact location of perpetrators to MoI beforehand anymore. Previously, ATRA notified the police about the whereabouts of perpetrators. The police launched raids and took bribe on the spot and released the culprits. At present, ATRA does not share the location with police until its own representatives are not part of the team to arrest fraudsters. The exact number of illegal SIM Boxes is not known. However, the existence of these boxes continues to result in huge money loss.²⁰

II. ENHANCEMENT OF ELECTRONIC GOVERNANCE SERVICES

OBJECTIVE	ACTIVITY 1	BASELINE	INDICATOR
Automation of Administrative procedures allowing for E-Services	Feasibility Study for a single government wide-automated-system	Currently, Ministries rely on paper based systems and lack electronic system for the management and collection of documents. Electronic systems that do exist are not integrated with each other	Technical team is assigned for the project
			Contract signed and company will start work on data collection
			Feasibility study is completed

²⁰ Interview with experts, Kabul, December 29, 2016.

FINDING:

E-government Directorate of the Ministry of Communication, Information and Technology was expected to study if it is feasible to make all administrative procedures of government electronic to bring transparency, effectiveness and equitable access to public services.

To achieve the first indicator of Anti-Corruption Plan, the E-government Directorate assigned a technical team to draft an e-government services plan listing 10 public services that shall be automated during the next 3 years.²¹

The deadline for the feasibility study has been set to be May 2017 but MCIT has not yet even started choosing any company to conduct the study. The Presidential Palace has assigned the head of E-Government Directorate to only prioritize Procurement, Driving-License and Visa services saying that is not realistic to study all systems simultaneously.²²

Relevant stakeholders are also of the same view that services should be made electronically one by one. Feasibility study of all services needs to be very comprehensive.²³ Therefore, even if MCIT had launched the study, it could not have completed it even by the end of 2017. Thus, since the automation of administrative e-procedures was not specific in the very beginning, the E-government Directorate of the Ministry failed to figure out which services should be prioritized first due to lack of consultations with experts, donors and other government officials.

OBJECTIVE	ACTIVITY 2	BASELINE	INDICATOR
Automation of Administrative e-procedures allowing for e-services to be provided to the public.	Project design for the automated system	Currently, Ministries rely on paper based systems and lack electronic system for the management and collection of documents.	Technical team will start work on designing of the project and prepare the final design document which will be shared with relevant ministries and independent directorates
		Electronic systems that do exist are not integrated with each other	Tender documents for bidding the project completed
			Tender process initiated

²¹ E-Government Services Plan, Kabul, April 3, 2016, page 5.

²² Interview with E-Government Directorate of MCIT, Kabul, January 5, 2017.

²³ Interview with USAID, Kabul, January 7th, 2017.

FINDING:

The project for e-government services is expected to be designed by May/June 2017. Nevertheless, no step has been taken by the E-Government Directorate that has been identified as the relevant entity for the task. Experts and donors believe that the project design and the feasibility study are both interrelated. The project cannot be designed and shared with other ministries unless the feasibility study is fully complete.²⁴

As there is no major progress yet in launching the study, it is hard to predict the project for the automated system will be designed even by June 2017.²⁵

III. HIRING COMPETENT PEOPLE AND INTRODUCING ORGANIZATIONAL REFORM

OBJECTIVE	ACTIVITY 1	BASELINE	INDICATOR
Increasing Transparency in Recruiting Process and Creating New (Tashkeel)	Review of organizational Tashkeel based on the Ministry's Requirement	Currently, there is a lot of overlap in MCIT's 2,792 personnel, while some key functions do not exist. This complicated structure has resulted in unaccountability and abuse of office.	Review of MCIT's current Tashkeel has been completed in cooperation with the AIRCSC and required organizational changes have been identified
			Organizational changes and implementation plan have been approved by the Minister, Council of Ministers and IARCSC
			Implementation of the organizational changes has been substantially initiated

²⁴ Interview with Information Technology Expert, December 29, 2016.

²⁵ Interview with USAID and WORLD BANK, January 7th, 2017.

FINDING:

Human Resource Directorate of the Ministry of Communication, Information and Technology has apparently reviewed the Tashkeel of MCIT by November 2016.²⁶

The main purpose to review the Tashkeel was planned to improve the Tashkeel and prevent overlap of positions. However, according to a letter, MEC has received from the HR and Tashkeel Department of MCIT; the Tashkeel was not substantially reviewed and no effective changes have been proposed.²⁷

The staff of Planning and Policy Directorate of MCIT confirmed to MEC that there is still no Monitoring and Evaluation Unit in the ministry.²⁸

Thus, the entire Tashkeel is outdated.²⁹ In the meantime, the leadership of the Ministry did not hire any expert to review and propose the changes. Instead, the HR and Tashkeel Department has sent the old version of the Tashkeel to be approved.³⁰

OBJECTIVE	ACTIVITY 2	BASELINE	INDICATOR
Increasing Transparency in Recruiting Process and Creating New (Tashkeel)	Enhance merit based recruitment through digitalization of the advertisements, applications and document submission procedures	The system for recruiting and hiring employees is entirely manual and vulnerable to manipulation	Requirements for digital processes are identified
			Design of the templates completed and uploaded on the website
			Implementation of the system has been initiated

²⁶ Istelam, HR Directorate, January 15, 2017.

²⁷ 1396 Tashkeel of MCIT, Kabul, January 15, 2017.

²⁸ Group discussion with the staff of Planning and Policy Directorate of MCIT, Kabul, January 26, 2017.

²⁹ Interview with Independent Administrative Reform and Civil Servants Commission, Kabul, January 28, 2017.

³⁰ Ibid

FINDING:

The HR Directorate of the Ministry of Communication, Information and Technology (MCIT) was supposed to initiate a merit-based recruitment process by digitalizing job announcements and application submission procedures.

By December 2016, the HR Directorate developed and added a new section in the website of the ministry titled the “HR SERVICES”. Job vacancies are announced and applicants can upload their applications through this section. This new section in the website has, however, not prevented manipulation of the recruitment process.

Test questions are given to applicants, who have personal contacts inside the ministry, in advance.³¹ MCIT has 2,792 staff across the country. Last year, 30 people were hired ranging from grade 3 to 8.³² Most of them were not qualified. They were hired because they had “influencing contacts”.³³

Administrative staff is hired on nepotism: Around 50 people applied for a job announced by the ministry last year, but none of them was hired. The leadership of MCIT hired the person that he knew.³⁴

Positions are purchased: There was a general belief among respondents that the above-mentioned reasons have created opportunities for rampant corruption in MCIT. There are also reports that officer-level positions are purchased from 50,000 AFS to 100,000 AFS.³⁵

IV. RAISING PUBLIC AWARENESS

OBJECTIVE	ACTIVITY 1	BASELINE	INDICATOR
Information Communication Technology client’s awareness of their rights	Establishing Afghanistan Information Portal the government of Afghanistan	There is no government wide portal that citizens can go to for information on public services	Request for Proposal is completed
			Transparent and competitive procurement process is completed
			The work of Afghanistan Portal completed and the system has been activated

³¹ Interview with low-level staff of MCIT, Kabul, January 10, 2016

³² Interview with HR Directorate of MCIT, Kabul, December 28, 2016.

³³ Interview with low-level staff of HR Directorate, Kabul, December 28, 2016.

³⁴ Discussion with Post Office Directorate staff of MCIT, Kabul, January 27, 2017.

³⁵ Ibid

FINDING:

The E-Government Directorate of the Ministry of Communication, Information and Technology has set up portal for Afghan government. This single source of information is about the history and culture of Afghanistan.³⁶ The website also contains the list of ministries and a section for job opportunities that are announced by different government institutions.³⁷ The first 3 indicators of this activity have been implemented in the year 2016.³⁸ However, the portal has not been activated yet.³⁹ Moreover, it seems that the E-government department is still not in the final stage of launching the portal because the content of the website has not been finalized yet.⁴⁰ No expert has been hired yet to develop its content and add e-services forms into the portal.⁴¹ To inaugurate the Portal, MCIT needs to upgrade its Data-Center and launch public awareness program about the system. These are the steps that the E-government Directorate of the Ministry should have taken while developing the portal. Officials in the E-Government Directorate argue that that they could not meet the deadlines due to lack of budget. Fortunately, Ministry of Finance has appropriated budget for MCIT's priorities this year.^{42 43}

³⁶ Interview with USAID, Kabul, January 7, 2017.

³⁷ Afghanistan Country Central Portal Plan, January 4, 2017, page 19.

³⁸ Request for Proposal, January 4, 2017.

³⁹ Interview with E-Governance Directorate of MCIT, Kabul, January 4, 2017.

⁴⁰ Interview with the low-level staff of E-governance Directorate of MCIT, Kabul, January 7, 2017.

⁴¹ Interview with USAID, Kabul, January 7, 2017.

⁴² Interview with Administrative Deputy Minister, Kabul, January 16, 2017.

⁴³ Interview with Planning and Policy Directorate of MCIT, Kabul, January 31, 2017.

OBJECTIVE	ACTIVITY 2	BASELINE	INDICATOR
Information Communication Technology client's awareness of their rights	Establishment of online complaint system for consumers	Complaints are not registered.	Technical assessment and design of the system complete
			Procurement for the design of the dynamic web-based system for receiving complaints is completed
			Dynamic web-based system for receiving complaints is implemented

FINDING:

Previously, complaints of consumers were filed only through phone conversations in the Ministry of Communication, Information and Technology.⁴⁴ However, Afghanistan Telecom Regulatory Authority (ATRA) has assessed, designed and launched a web-based system for receiving public complaints ahead of the deadline that was set for the establishment of such a system in MCIT's annual Anti-Corruption Plan.⁴⁵

To assess the effectiveness of the system, the assessment team has sent a test-complaint through the website. ATRA confirmed to the team the receipt of its complaint and promised to follow it up. This web-based complaint system was launched a month ago. So far, 55 public complaints have been received by ATRA.

The reason for fewer complaints is that ATRA did not launch a public awareness program yet. Several mobile phone users in Kabul, interviewed by MEC, did not know about the establishment of a web-based complaint system in MCIT.⁴⁶ Despite having now an online complaint system, ATRA's complaint unit has 8 operators that register public complaints and share them with telecom companies afterwards. These 8 operators work in day shift. The complaint unit uses voice mails for night calls and operators register them when they show up next day.

⁴⁴ Interview with phone operators of ATRA, Kabul, January 15, 2017.

⁴⁵ Direct Observation, Kabul, January 15, 2017.

⁴⁶ Interview with mobile phone users, Kabul, January 16 2017.

