



Online RTI Appeal Form Details

RTI Appeal Details :-

RTI Appeal Registration number	RBIND/A/E/26/01148
Public Authority	Reserve Bank of India

Personal Details of Appellant:-

Request Registration Number	RBIND/R/E/26/02138
Request Registration Date	09/03/2026
Name	Yogi M P Singh
Gender	Male
Address	Surekapuram colony, Shri Laxmi Narayan Baikunth Ma , Jabalpur Road, Mirzapur city
Country	India
State	Uttar Pradesh
Status	Urban
Educational Status	Literate
	Above Graduate
Phone Number	Details not provided
Mobile Number	+91-7379105911
Email-ID	yogimpsingh[at]gmail[dot]com

Appeal Details :-

Citizenship	Indian
Is the Requester Below Poverty Line ?	No
Ground For Appeal	Provided Incomplete,Misleading or False Information
CPIO of Public Authority approached	DOR - Shri Manoj Mathur
CPIO's Order/Decision Number	Details not provided
CPIO's Order/Decision Date	

(Description of Information sought (upto 500 characters))

<p>Prayer or Relief Sought</p> <p> GROUNDS FOR FIRST APPEAL UNDER SECTION 19(1) OF THE RTI ACT, 2005 To: The First Appellate Authority Department of Payment and Settlement Systems (DPSS) Reserve Bank of India Central Office, Mumbai Subject: First Appeal against the superficial, evasive, and non-functional reply provided by the CPIO for Registration No: RBIND/R/E/26/02138/1 Respected Sir, The Appellant is highly aggrieved by the performance-based, passive denial of information executed by the CPIO via letter dated April 08, 2026. The CPIO has acted entirely against the spirit of the RTI Act, 2005, by creating an illusion of disclosure while actively withholding core records. The grounds for this appeal are as follows: </p>

1. Constructive Denial via Broken Hyperlink (Query 1):

The CPIO directed the Appellant to a web URL to access the Master Directions on OTP exemptions. However, the link provided in the physical/digital text is truncated, broken, and completely non-functional. Directing a citizen to a dead internet link is a direct failure to provide information under Section 7(9) of the Act.

2. Complete Omission of Response (Query 3):

The CPIO completely dropped and ignored Query No. 3 regarding internal Risk Assessment Reports or Impact Assessment Reports from the response layout. The CPIO neither provided the records nor cited any statutory exemption under Section 8(1) to legally justify this total omission.

3. Factually Absurd and Bad-Faith Claims of No Information (Queries 2 and 6):

The CPIO claims the RBI holds no minutes or records concerning the regulatory deliberations to bypass OTPs for low-value transactions, nor a list of services exempted. As the sole statutory regulator under the Payment and Settlement Systems Act, 2007, it is legally impossible for the RBI to alter public financial security frameworks without explicit internal committee or Board deliberations. Denying the existence of these minutes is an intentional suppression of public records to shield corporate-bureaucratic actions from scrutiny.

4. Public Interest Override:

As admitted by the CPIO under Query 5, the Integrated Ombudsman registered a staggering 4,786 complaints regarding Cardless transactions carried out without OTP/PIN in less than a single year. This high frequency of unauthorized debits establishes a massive, undeniable public interest under Section 8(2) of the RTI Act, overriding any claim of administrative secrecy.

PRAYER / RELIEF SOUGHT:

The Appellant prays that the First Appellate Authority pull up the CPIO for issuing a deceptive, non-functional, and evasive reply. The FAA is requested to direct the CPIO to provide actual, hard, printed copies of:

- Full text of Annexure-1 of the Master Directions dated September 25, 2025.
- Official Minutes of the BPSS/Internal Committees where No-OTP limits were debated and finalized.
- Internal Risk/Impact Assessment files relating to these exemptions.

Supporting document *(only pdf upto 1 MB)*

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To, The Central Public Information Officer (CPIO), Reserve Bank of India, Department of Payment and Settlement Systems (DPSS), Central Office, Mumbai.

Subject: Request for information under the RTI Act, 2005 regarding exemptions from One-Time Password (OTP) and Additional Factor of Authentication (AFA).

Details of Information Sought:

1. **Guidelines on OTP Exemptions:** Please provide a copy of the current Master Direction or specific circulars that list all categories of digital payment transactions (e.g., contactless card payments, recurring e-mandates, UPI Lite, etc.) where banks/payment aggregators are permitted to process payments **without a One-Time Password (OTP)** or Additional Factor of Authentication (AFA).
2. **Minutes of Meetings:** Please provide the **Minutes of the Meetings** of the Board for Regulation and Supervision of Payment and Settlement Systems (BPSS) or any internal RBI committee where the decision to allow/increase limits for "No-OTP" transactions (such as the increase in contactless limits to ₹5,000) was deliberated and approved.
3. **Risk Assessment Reports:** Please provide copies of any internal studies, office memos, or "Impact Assessment Reports" conducted by the RBI or shared by stakeholders (NPCI, Card Networks) regarding the **security risks to account holders** when payments are allowed without OTP.
4. **Correspondence with Banks:** Please provide copies of Office Memorandums (OMs) or instructions issued to Scheduled Commercial Banks between **2023 and 2026** regarding the implementation of "Authentication Mechanisms for Digital Payment Transactions Directions, 2025" specifically concerning exemptions for low-value transactions.
5. **Data on Unauthorized Transactions:** Please provide statistical data held by the RBI regarding the number of "unauthorized transaction" complaints received for payments made via methods that do not require an OTP (Contactless/E-mandates) for the financial years **2024-25 and 2025-26**.
6. **Payment from bank accounts without OTP: Automated payment is the violation of the consumer rights. Please provide the list of the services when merchants can draw the money without OTP From the bank accounts of the consumers. Provide the office memos, Guidelines, Government orders Circulars which justify The payments without one time password (OTP).**

This is a humble request of the information seeker to provide the six points of information within stipulated time as prescribed under subsection one of section 7 of the right to information act 2005.

Date:09/03/2026

With regard

**Yogi M P Singh, Mobile number: 7379105911,
Mohalla Surekapuram Colony Jabalpur Road, Mirzapur City pin code 231001 Uttar Pradesh**



भारतीय रिज़र्व बैंक
RESERVE BANK OF INDIA

www.rbi.org.in

CO.DPSS.ADM.No.S19/01-06-006/2026-2027

April 08, 2026

Yogi M P Singh

Surekapuram colony, Shri Laxmi Narayan Baikunth Ma, Jabalpur Road, Mirzapur city,
Pin:231001

महोदय,

Sir,

सूचना का अधिकार अधिनियम 2005 के अंतर्गत
आवेदन- आरबीआईएनडी/आर/ई/26/02138/1

Application under Right to Information
Act, 2005 - RBIND/R/E/26/02138/1

कृपया सूचना का अधिकार अधिनियम, 2005 के
अंतर्गत सूचना प्राप्त करने के लिए प्रस्तुत अपने दिनांक
09 मार्च 2026 के आवेदन का संदर्भ लें।

Please refer to your application dated,
March 09, 2026, seeking certain
information under the Right to Information
Act, 2005.

2. संबंधित जानकारी अनुबंध में प्रस्तुत है।

2. The information is furnished in the
Annex.

3. हम आपको सूचित करना चाहते हैं कि भुगतान
और निपटान प्रणाली (भु.नि.प्र.) विभाग, भारतीय
रिज़र्व (भा. रि.) बैंक में प्रथम अपीलीय प्राधिकारी
का नाम, श्री गुणवीर सिंह, प्रभारी मुख्य महाप्रबंधक,
भु.नि.प्र. विभाग, भा. रि. बैंक, 14 वीं मंजिल, केंद्रीय
कार्यालय भवन, शहीद भगत सिंह मार्ग, फोर्ट, मुंबई
- 400001 हैं। उपर्युक्त उत्तर के संबंध में आप
यदि कोई अपील करना चाहें तो उसे इस पत्र की
प्राप्ति के 30 दिनों के भीतर प्रथम अपीलीय
प्राधिकारी को भेज सकते हैं।

3. We would like to inform that the First
Appellate Authority in Department of
Payment and Settlement Systems
(DPSS), Reserve Bank of India (RBI) is
Shri Gunveer Singh, Chief General
Manager-in-Charge, DPSS, RBI, 14th
Floor, Central Office Building, Shahid
Bhagat Singh Road, Fort, Mumbai -
400001. Appeal, if any, in respect of the
above reply, should be preferred within 30
days to the First Appellate Authority

भवदीय/ Yours faithfully

(माथला गायत्री)

केंद्रीय जन सूचना अधिकारी / Central Public Information Officer

Encl: As above

भुगतान और निपटान प्रणाली विभाग, केंद्रीय कार्यालय, 14 वीं मंजिल, केंद्रीय कार्यालय भवन, शहीद भगत सिंह मार्ग, फोर्ट, मुंबई - 400001

फोन Tel: (91-22) 2264 4995; फैक्स Fax: (91-22) 22691557; ई-मेल e-mail: cpiodpss@rbi.org.in

Department of Payment and Settlement Systems, Central Office, 14th Floor, Central Office Building, Shahid Bhagat Singh Marg, Fort, Mumbai - 400001

हिंदी आसान है, इसका प्रयोग बढ़ाएँ

RBIND/R/E/26/02138/1

Sr. No	Query	Proposed Reply
1.	Guidelines on OTP Exemptions: Please provide a copy of the current Master Direction or specific circulars that list all categories of digital payment transactions (e.g., contactless card payments, recurring e-mandates, UPI Lite, etc.) where banks/payment aggregators are permitted to process payments without a One-Time Password (OTP) or Additional Factor of Authentication (AFA).	You may refer to Annexure-1 of Reserve Bank of India (RBI)'s Circular dated September 25, 2025, on 'Reserve Bank of India (Authentication mechanisms for digital payment transactions) Directions, 2025', which is available and can be accessed through following link: https://rbi.org.in/scripts/FS_Notification.aspx?Id=12898&fn=9&Mode=0
2.	Minutes of Meetings: Please provide the Minutes of the Meetings of the Board for Regulation and Supervision of Payment and Settlement Systems (BPSS) or any internal RBI committee where the decision to allow/increase limits for "No-OTP" transactions (such as the increase in contactless limits to ₹5,000) was deliberated and approved.	RBI does not have any information in this regard.
3.	Risk Assessment Reports: Please provide copies of any internal studies, office memos, or "Impact Assessment Reports" conducted by the RBI or shared by stakeholders (NPCI, Card Networks) regarding the security risks to account holders when payments are allowed without OTP.	
4.	Correspondence with Banks: Please provide copies of Office Memorandums	You may refer to our response to S.No. 1 above.

	(OMs) or instructions issued to Scheduled Commercial Banks between 2023 and 2026 regarding the implementation of "Authentication Mechanisms for Digital Payment Transactions Directions, 2025" specifically concerning exemptions for low-value transactions.	
5.	Data on Unauthorized Transactions: Please provide statistical data held by the RBI regarding the number of "unauthorized transaction" complaints received for payments made via methods that do not require an OTP (Contactless/E-mandates) for the financial years 2024-25 and 2025-26.	RBI does not have any information in this regard. 2. However, the total number of complaints received at Offices of Reserve Bank Integrated Ombudsman under subcategory "Cardless transactions carried out without OTP/PIN" of category "Unauthorised transactions" from April 01, 2025 to March 26, 2026 is 4786.
6.	Payment from bank accounts without OTP: Automated payment is the violation of the consumer rights. Please provide the list of the services when merchants can draw the money without OTP From the bank accounts of the consumers. Provide the office memos, Guidelines, Government orders Circulars which justify The payments without one time password (OTP).	RBI does not have any information in this regard.

