

## **NINONG ERING**

Member of Legislative Assembly  
(MLA)  
Pasighat West, Arunachal Pradesh



May 22, 2021.

Dear Shri Narendra Modi ji,

Last year, under your leadership, the Government of India took a very bold and decisive step to ban over 260 foreign apps and websites.

These apps were banned by the Ministry of Electronics and Information Technology, Government of India (MeitY) under section 69A of the Information Technology Act as these apps were engaging in activities that were prejudicial to the sovereignty and integrity of India, defence of India, security of India and public order in India.

One of the apps that were banned was PUBG Mobile. There are multiple reports of addiction, monetary loss, self-harm, accidents, suicides and murders attributed to this game.

However, while our country is currently battling with the Covid pandemic and the Central and various state governments are trying their best to contain that, according to recent media reports, unscrupulous companies connected to PUBG, including Krafton, Tencent and PUBG India Pvt. Ltd., are trying to sidestep our laws, deceive the government and Indian citizens and relaunch the game with a new name of Battlegrounds Mobile India (BMI).

Sir, this is a mere illusion and a trick to relaunch the same game with minor modifications and collect user data of millions of our citizens, including our children and transfer it to foreign companies and the Chinese government.

The Chinese company Tencent is the world's biggest gaming company and has a stake in over 300 gaming companies. However, its stake has raised national security concerns in multiple countries. The United States Committee on Foreign Investment (CFIUS) has asked companies in US which have Tencent stake about their security protocols and handling of data. CFIUS is currently discussing the potential divestment of Tencent from American gaming companies. Similarly, Tencent's stake in local gaming companies has also raised serious national security concerns in Japan and other nations.

Tencent is currently the second-largest stakeholder and has a 15.5% stake in Krafton. Its stake was only 10% in 2018 and it may soon have a majority stake and control. While after the ban on PUBG in India, Krafton allegedly stopped its agreement with Tencent in India, however, Tencent is still the publisher and distributor of PUBG Mobile outside India. Very

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curiously, almost all of Krafton's Indian employees, including its senior management team, are former Tencent employees who were miraculously all hired by Krafton in December last year and working on BML. Moreover, as on May 20, the Google Play store app package itself has pubg.imobile in its url for the pre-registration of Battleground game.

Additionally, Krafton has recently invested in Nodwin Gaming, which according to report will host PUBG on its servers. Nodwin has extensive ongoing ties to Tencent and according to news reports also offers its services in Pakistan and has a team and administrators there, raising massive security concerns. Krafton has very close ties with Tencent and is now also an investor in Nodwin which works very closely with Tencent.

Sir, all this points only to one definite conclusion, the new game is simply a relaunch of PUBG Mobile, under a new name and new entity. The gameplay features and other aspects will be the same. Krafton has also added maps from PUBG in the re-launched game and the weapons will also be the same with just new names. The renamed PUBG is Tencent's indirect way of entering India and capture data and details of Indian citizens. The privacy policy of re-launched PUBG states that while data will be stored in servers located in India and Singapore, it will be transferred to other countries and regions to operate the game service and meet legal requirements. According to reports, Tencent shared all its data with Krafton, which may also continue with Krafton sharing it with Tencent, one of its biggest shareholders. The launch announcement is also timed with the launch of Krafton's IPO, from which Tencent will directly benefit.

The Supreme Court of India has repeatedly reiterated that what cannot be done directly cannot be indirectly done. However, in this case, Krafton and Tencent are trying to do precisely that. A banned app cannot be allowed to relaunch just by giving a makeover and a new name. Apart from cosmetic changes, which are eyewash, this is nothing but a circumvention of Indian laws. If this is allowed, it will lead others including TikTok and WeChat to re-enter the country.

If the game is allowed to re-launch, in that case, there is a very high potential of a breach of privacy and cybersecurity of our citizens, and all the other risks of addiction, harm, deaths that were seen with PUBG before. Very worrying, this will be a complete disregard of our

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laws and the ban order passed last year. In the interest of India's sovereignty and integrity, its defense, security and public order, and to clearly communicate that Indian law is paramount and cannot be sidestepped, I request you to ban Battlegrounds Mobile India and also restrict the entry of such entities in the future without explicit approval from the government.

Jai Hind

Yours sincerely,



NINONG ERING  
MLA

37, Pasighat West (ST) A/P  
Govt. of (A.P.)

Shri Narendra Modi  
Hon'ble Prime Minister of India  
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New Delhi - 110001

Copy to:

- i. Shri Amit Shah, Hon'ble Home Minister of India
- ii. Dr. P.K. Mishra, Principal Secretary to the Hon'ble PM
- iii. Sh. Ajit Doval, Nation Security Advisor
- iv. Shri A.K. Bhalla, Union Home Secretary
- v. Shri V.S.K. Kaumudi, Special Secretary (Internal Security), Ministry of Home Affairs
- vi. Lt. Gen. Rajesh Pant, National Cybersecurity Coordinator
- vii. Shri S. Gopalakrishnan, Additional Secretary to the Hon'ble PM