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Project Information Document/ Integrated Safeguards Data Sheet (PID/ISDS)

Concept Stage | Date Prepared/Updated: 27-Apr-2017 | Report No: PIDISDSC20190



BASIC INFORMATION

A. Basic Project Data

Country Central Asia	Project ID P160230	Parent Project ID (if any)	Project Name Digital CASA - Central Asia - Kyrgyz Republic (P160230)
Region EUROPE AND CENTRAL ASIA	Estimated Appraisal Date Jul 07, 2017	Estimated Board Date Nov 30, 2017	Practice Area (Lead) Transport & ICT
Financing Instrument Investment Project Financing	Borrower(s) Ministry of Finance	Implementing Agency State Committee of Information Technologies and Communications (SCITC)	

Proposed Development Objective(s)

Digital CASA – Program level PDO: The proposed regional program PDO is to increase access to more affordable Internet services, improve government's capacity to deliver digital public services and facilitate opportunities for digitally-enabled income generation.

Digital CASA – Central Asia (Kyrgyz Rep.) PDO: The proposed country-specific PDO is to increase access to more affordable Internet services, improve government's capacity to deliver digital public services and facilitate opportunities for digitally-enabled income generation in the Kyrgyz Republic.

Financing (in USD Million)

Financing Source	Amount
Borrower	0.00
International Development Association (IDA)	27.50
IDA Grant	22.50
Total Project Cost	50.00

Environmental Assessment Category B-Partial Assessment	Concept Review Decision Track II-The review did authorize the preparation to continue
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Other Decision (as needed)

B. Introduction and Context

Country Context

1. Despite the negative impact of the latest regional economic developments, the Kyrgyz economy has been relatively stable in 2015. Although gold output declined by 8.3 percent, non-gold growth stood at 4.5 percent, with an expansion in agriculture compensating for a slowdown in services and construction and a contraction in industry. Economic growth is estimated to have reached 3.5 percent in 2015, driven by a good agricultural harvest on the production side and increased net exports on the expenditure side¹. The government's monetary and fiscal policies have been broadly adequate to mitigate exchange-rate and demand shocks. Given substantial pressures on the exchange rate in the wake of Kazakhstan's move to a free float, the authorities' adopted a prudent strategy in letting the local currency (KGS) gradually adjust, while preventing sharp swings in its value².

2. Kyrgyz Republic achieved significant reductions in poverty, but many rural areas still remain poor. More than 32.6 percent of people living in rural areas are below the poverty line compared to 26.9 percent in urban areas³. The absolute poverty rate declined by more than 6 percentage points in 2014 compared to 2013, while extreme poverty has decreased by 1.5 percentage points since 2013⁴. The labor market was the most important factor driving down poverty in the Kyrgyz Republic in 2013–2014. Wages remain the most important driver of improved living standards, along with pensions. Earnings from selling agricultural products also played an important role in poverty reduction. The reduction in remittances put upward pressure on poverty, especially in migrant households. On average, 23 percent of households in the bottom quintile of the distribution receive remittances from abroad that account for 7 percent of household consumption⁵.

3. Improved governance, reduced corruption and job creation, particularly for youth and women, are among key national priorities. The “National Sustainable Development Strategy for the Kyrgyz Republic for the period 2013-2017” (NSSD) identifies public administration reform as one of the top priorities for the country⁶. It states that previous reforms of the public sector did not produce desired results, they were “cosmetic” rather than real changes of socio-economic development governance processes. Levels of public trust are low, and citizens have negative perception of economic governance in the energy and mining sectors and in the area of public financial management, particularly public procurement⁷. The anticorruption agenda is seen as a priority for all branches of government in the Kyrgyz Republic. Higher standards in public accountability, better

¹ <http://pubdocs.worldbank.org/en/744011461221797191/Kyrgyzrepublic-Snapshot-s2016-en.pdf>

² <http://www.worldbank.org/en/country/kyrgyzrepublic/publication/economic-update-fall-2015>

³ National Statistics Committee, 2015

⁴ <http://pubdocs.worldbank.org/en/744011461221797191/Kyrgyzrepublic-Snapshot-s2016-en.pdf>

⁵ Kyrgyz Republic Household Survey, 2014

⁶ <http://donors.kg/images/NSSD-final-version-eng-Feb4.doc>

⁷ Global Competitiveness Report 2015–2016, the World Economic Forum



enforcement of control over the budget, and stronger management of public assets continue to be important targets of the governance reform program.

Sectoral and Institutional Context

4. **Kyrgyz Republic's telecommunications sector has developed significantly over the last decade.** Significant developments have taken place in the sector since the country's telecommunications legislation⁸ was adopted in 1998. State Committee of Information Technologies and Communications of Kyrgyz Republic (SCITC), which is responsible for the implementation of the national policies and programs in the areas of connectivity improvement and e-governance, was established in June 2016 through the merger of various authorities and institutions in ICT area previously dispersed among a number of government agencies including the Telecommunications Directorate under the Ministry of Transport and Communications, the Center of Electronic Governance and various e-governance departments from different ministries (Economy, Finance, National Security Committee). The head of SCITC has two deputies who are responsible for telecom and ICT infrastructure and for e-government, cybersecurity, and projects implementation. The State Communications Agency at SCITC is officially a separate legal entity with own seal and director who is appointed by the Prime Minister on the proposal of the Chairman of SCITC. The State Communications Agency is the independent telecommunications sector regulator, and continues to perform the telecommunications licensing, monitoring, and analytics functions to guide and support national Internet development efforts. The telecommunications licensing rules in the Kyrgyz Republic appear to be transparent and nondiscriminatory. According to the regulator, the same procedures and licensing fees apply to both domestic and foreign companies. The State Communications Agency also gathers Internet traffic data. In addition, other state agencies play a role in overseeing different components of the domestic Internet environment. The Antimonopoly Committee controls prices for OJSC "Kyrgyztelekom"; the State Agency for Architecture and Construction handles permits for laying fiber and setting up ducts, masts, and mobile towers; and the Border Control Agency oversees border area construction including fiber crossing over international borders.

5. **The wireless market is fully competitive and currently consists of three major mobile operators.** Mobile operators include Megacom, Beeline and NurTelecom, which have developed mature 2G, 3G and now 4G mobile infrastructure and services in the Kyrgyz Republic. As a result, the coverage has reached close to 98 percent population and mobile penetration leapfrogged from 10 percent to 133 percent between 2006 and 2016. Further, the introduction of 3G mobile broadband services in 2011 and 4G services in 2016 contributed to a significant boost in broadband Internet penetration.

6. **Kyrgyz Republic's primary international connectivity** consists of four links to Kazakhstan (including connectivity constructed in a tunnel under the Chu River) and two to China. Connections to Tajikistan and Uzbekistan also exist but are not widely used to accommodate Kyrgyz demand for bandwidth, in part because of the high cost of bandwidth in those countries compared to transit purchased via Kazakhstan. Sources indicated that at the present time, the Kyrgyztelecom link to China is intended primarily for providing transit capacity to Tajikistan.

7. **ElCat's fiber network connects to the Tajikistani border, as well as northward to Kazakhstan and eastward to China.** Megaline has a fiber connection to Kazakhstan constructed in 2012 and a second diverse connection constructed in 2015, although the second one is inactive. IPNet has an inactive connection to Kazakhstan. Competitive operators reported that as a result of the January 2015 amendments to the telecommunications law, authorities had prevented their personnel from accessing international segments to Tajikistan and Kazakhstan in order to perform standard maintenance and repair⁹.

8. **In terms of domestic backbone connectivity, the links between Bishkek and other population centers within the country, notably Osh require significant improvement.** Kyrgyztelecom and Elcat own and operate terrestrial fiber

⁸ Law of the Kyrgyz Republic on the Electronic and Postal Communications

⁹ Central Asia Regional Connectivity Pre-Feasibility Assessment: Afghanistan, Kyrgyz Republic, and Afghanistan. Terabit Consulting, Inc. 2016



between Bishkek and Osh. Mobile operators (Megacom and Beeline) plan to put into operation their backbone optical fibers till end of 2016, but still domestic capacity is relatively expensive and fiber quality is poor. The success of bridging the digital divide in Kyrgyzstan depends on technically competent implementation of a large set of measures: the creation of high-speed communication channels and productive IT infrastructure, application development and services for various social groups. The first step towards the elimination of the digital divide is the modernization of cable/fiber infrastructure to increase the capacity and redundancy of internal and international connectivity, existing and new infrastructure to help extend networks, while supporting new initiatives to reach un- or underserved rural areas. Alternatives include microwave for mobile backhaul, and building a new fiber network to both compete and provide additional redundancy in the country. Fiber deployment, if not built along existing road or power transmission infrastructure, can be challenging, however, given the local climate that makes it hard or impossible to conduct works in the winter, compounded by the mountainous terrain. International connectivity is of utmost importance for countries with developing Internet ecosystems. 80% of the Internet traffic in the Kyrgyz Republic is international and 20% is domestic, it means that Internet access is dependent on the quality and cost of international connectivity¹⁰.

9. Despite the sector's development, high speed Internet remains costly for individuals and small businesses and decisive public sector policies and catalytic investment are required in order to accelerate private investment. For a landlocked country like the Kyrgyz Republic, international connectivity takes on additional significance because the country has no direct connection to submarine cables. Recent years have seen a wave of submarine-cable deployments that provide some countries with their first submarine-cable landing stations and other countries with additional new submarine-cable landing stations, thereby generally increasing competition and network redundancy. The Kyrgyz Republic, however, is dependent on both factors—where submarine cables land and having terrestrial connections across more than one country to reach submarine cable landing stations. Other than direct access via China, at least two countries stand between the Kyrgyz Republic and a submarine-cable landing station. Access into Russia is attractive for two reasons: a commonly shared language means that a significant amount of content is available in Russian, and the relative size of the Russian Internet ecosystem offers sufficient connectivity from Russia to Europe and beyond. Access to Russia must be made through Kazakhstan and the bulk of international capacity from the Kyrgyz Republic goes via Kazakhstan to Russia. Given the dependence of Kyrgyz ISPs on this international connectivity, the price of international connectivity is a significant factor. Price is also an indicator of the level of competition in a country and the regulatory challenges related to international capacity. There is a significant markup between the transit prices in Russia and Kazakhstan and the transit price in the Kyrgyz Republic.

10. The Kyrgyz Republic has made substantial progress in e-Government since 2002 with the support of international organizations, but further proactive and coordinated actions are required. Political instability, lack of coordinated policy, weak institutional memory across government institutions, and funding constraints are the main obstacles for consistent e-Government development in the country. Currently ministries and agencies provide mostly informational services through their websites, while only few of them deliver transactional services allowing to fill online applications for services and to send notifications. The key databases and information systems of government agencies are mostly fragmented.

11. The institutional structure for ICT and e-governance in Kyrgyzstan has been recently changed and moved toward increased centralization. At the top level, the national ICT Council is an advisory body and coordinates cross-agency e-governance programs, and designates specific leaders for projects and programs. Officially the National ICT Council is headed by the Prime Minister who can delegate his authority to deputies. The ICT Council meets on a quarterly basis.

12. The recently established SCITC is in charge of ICT policy, including in the area of e-government. The SCITC manages several state-owned ICT enterprises (Info-System, Transcom, etc.), including the postal service (KyrgyzPochtasy)

¹⁰ https://www.internetsociety.org/sites/default/files/Kyrgyzstan_Study.pdf



and the Secretariat of the ICT Council is located at SCITC. SCITC is responsible for policy implementation and interagency coordination in informatization, e-governance, e-services, electric and postal communications, including TV and radio broadcasting, according to its Statute. To ensure coordinated implementation of the e-Government strategic plan for 2014-2017¹¹ and recognizing the transformational power of digital technologies both in public and private sectors, the Government of the Kyrgyz Republic established the E-Governance Center, currently integrated into the SCITC¹².

13. At present, the government of Kyrgyz Republic lacks sufficient human resources, institutions, policies and adequate IT infrastructure to deploy high quality digital services in a secure, reliable and cost effective manner. The limited number of digital services that have been developed are typically isolated and expensive to build, maintain and secure. While these deficits represent a significant challenge, the advantage is that the relative lack of investment in outdated, legacy infrastructure and digital services offerings presents an opportunity to leapfrog to the latest technology and to learn from global experience by adopting best practice institutional structures and policies.

14. There is a need for the Government to significantly reduce the cost and time taken by line ministries to develop and maintain new digital services. Currently, ministries and agencies of Kyrgyz government spend considerable time and money to develop, implement and operate their own stand-alone IT systems. They could significantly speed up the deployment of digital services and cut costs by leveraging a shared infrastructure and services platform for their data storage, hosting, security, data sharing, citizen authentication, e-payment, professional IT support and other needs. This approach would allow the line ministries to focus on the areas of their areas of core competency when developing a new digital service, rather than worry about the issues of IT infrastructure, cybersecurity, etc.

15. Low basic ICT literacy rates have been identified as one of the key barriers to the greater use of ICTs by citizens and the private sector. This is hindering their participation in the digital economy and constraining their ability to access digital services. The lack of more advanced ICT skills, and an insufficient number of certified computer engineers and IT professionals, is also a constraint to sector growth and innovation. The rapid growth of new technologies and business models, demographic shifts, and economic trends are likely to have significant global impacts. Such effects will necessarily cause stresses in labor markets as existing jobs change, evolve and in some cases disappear. Advances in robotics, artificial intelligence, autonomous/semi-autonomous vehicles are a few examples of disruptive technologies that are gaining momentum. Countries in preparing for the future will, therefore, need to pursue agile strategies for rapidly aligning skills to fast changing demand in labor markets.

16. Aiming to foster digital development and implementation of digital government, the Government of Kyrgyz Republic expressed its interest in participating in the Digital CASA program. The Digital CASA program will help improve Kyrgyzstan's international connectivity, upgrade fiber optic networks within the country, and develop enabling digital platforms and solutions. They in turn, will help enhance government efficiency and transparency and quality of public services, and facilitate digital entrepreneurship and business through expanded availability of digital infrastructure and services.

Relationship to CPF

17. World Bank support in the ICT sector has been consistent with the National Sustainable Development Strategy of Kyrgyz Republic 2013-17. The Strategy recognizes the pivotal role ICT and e-Government play in achieving national priorities and sustainable development goals. The Digital CASA program intends to support development of a digital foundation for transparent and accountable public governance and services, equitable and inclusive growth and also facilitating regional trade and integration.

¹¹ <http://mineconom.gov.kg/Docs/1/PPEU.pdf>

¹² <http://cbd.minjust.gov.kg/act/view/ru-ru/98511>



18. **The Digital CASA program, through the promotion of growth enabled by infrastructure development, competitiveness and jobs, and social inclusion, is also aligned with the World Bank’s regional strategies for Europe and Central Asia (ECA) and South Asia (SAR).** The ECA region’s strategy focuses on two main pillars: (1) competitiveness and shared prosperity through jobs; and (2) environmental, social, and fiscal sustainability, including through climate action. Governance and gender continue to be thematic priorities within interventions of both pillars. The SAR region’s strategy (updated March 2015) is based on three strategic pillars: (1) accelerating economic growth including investments in infrastructure, energy, urbanization, agriculture while expanding access to finance and promoting regional and global integration; (2) enhancing social inclusion by addressing the severest exclusions while improving the quality/access to health, education, and other public services and finance, social protection and increase labor force participation; and (3) climate and environment management to help countries prevent disasters and improve their readiness.

19. **The Digital CASA program is also fully aligned with the World Bank Group’s twin goals and the recommendations of the World Development Report 2016 - “Digital Dividends” (WDR16).** In particular, the Digital CASA Program is expected to make affordable and reliable high speed Internet services available to a larger share of population, including the poor in CA and SA countries, therefore contributing to the twin goals of ending extreme poverty and promoting shared prosperity. The WDR16 provides a strong rationale to support the ICT sector, suggesting strong linkages between broadband access, growth and jobs. For instance, access to high speed broadband promotes inclusion of firms in the world economy by expanding trade, raising the productivity of capital, and intensifying competition in the marketplace. It also brings opportunities to the citizens by creating jobs and transforming public service delivery. However, in order for countries to reap these benefits, they need to be complemented by a strong enabling environment, including comprehensive legal and regulatory frameworks as well as skills.

C. Proposed Development Objective(s)

Note to Task Teams: The PDO has been pre-populated from the datasheet for the first time for your convenience. Please keep it up to date whenever it is changed in the datasheet.

The proposed Regional Program Development Objective is to: increase access to digital services across the region and within countries via a regionally integrated, secure and affordable digital infrastructure, as key pillars of the regional digital economy.

The proposed Kyrgyz Republic Project Development Objective is to: increase access to digital services via regionally integrated, secure and affordable digital infrastructure and platforms, to foster economic growth, government efficiency and job creation, as key pillars of the national digital economy.

Key Results (From PCN)

Program Level PDO indicators (to be tracked at country and regional levels)

- International Internet Bandwidth per Capita (Kbps)
- Wholesale Transit Pricing per Mbps (\$)
- Retail price of Internet services (per Mbps per month [\$])
- Access to Internet services (number of subscribers per 100 people)
- Direct project beneficiaries (number), of which female (percentage)

Country Level PDO indicators (specific to Kyrgyzstan)



- Length of fiber optic network built (km)
- Electronic transactions of public services (%)
- Percentage of trained individuals that are employed after three months of skills development program completion (of which female, number and percentage)

Potential intermediate indicators (specific to Kyrgyzstan)

- Level of digitalization of local telecommunications networks (%)
- Broadband Internet subscriber penetration (%)
- Share of public services provided in electronic format (%)
- Satisfaction of citizens and businesses with digital government services (%)
- Growth of transit data streams (%)

D. Concept Description

20. **Digital CASA – Central Asia (KG) is estimated at around US\$ 20 million, with funding consisting of a mix of regional and national IDA funds.** This project will support the development of reliable, cost-effective, high-bandwidth international and domestic broadband connectivity infrastructure and shared digital government infrastructure, which will create the foundations for the development of digital economy in the Kyrgyz Republic. This will stimulate the growth of the ICT industry by providing open, equal access to high-bandwidth connectivity; achieve savings in capital and operating costs through the introduction of digital infrastructure sharing by the government.

21. **Modern digital infrastructure, platforms and solutions** for effective public governance, quality services and creating jobs will be instrumental in addressing citizens' expectations and needs. Complemented with effective institutional arrangements, relevant policies, legislation and regulation, they will facilitate digital transformation in public sector and across all economic sectors. Shared digital platforms, innovative solutions and channels for effective delivery of public and municipal services will help prevent corruption by minimizing personal contacts between citizens, businesses and the state, and build citizens' and businesses' trust in government. Since this is a regional program with significant spillover benefits across countries, supplementary regional IDA funding is expected to complement national IDA allocations for up to two-thirds of the total IDA financing of the regional activities to allow increase project financing up to \$30-40 mln if the government desires. The components will be structured as follows:

22. **Component 1: Digital Infrastructure, \$7.0 million.** This component will finance domestic and cross-border connectivity infrastructure that is needed to ensure greater access to affordable high speed Internet services, both within Kyrgyz Republic and in the neighboring countries. This will be done through a variety of PPP arrangements as well as providing innovative financing mechanisms for a consortium of firms that include regional/local Internet Service Providers with the aim to develop a competitive telecom market in the country. Activities may include but are not limited to: (i) completion of the regional Backbone consisting of existing fiber optic networks, newly established cross-border fiber-optic links to strengthen the connectivity with neighboring countries; (ii) deployment of high capacity, domestic fiber-optic networks, to establish effective and resilient national backbone network, including through infrastructure sharing arrangements with others, such as electricity and railways; (iii) financing of the pre-purchase of Internet bandwidth for government.

23. **Component 2: Digital Platforms and Smart Solutions (\$10 mln).** This component will focus on establishing solid foundations by financing shared government infrastructure (G-Cloud), digital platforms and enablers to allow the government to significantly reduce the cost and time taken to develop and maintain new digital services.



24. **Component 3: Enabling Environment for Digital Economy (\$2.0 million):** This component is designed to strengthen the laws, regulations, institutional and human capacity and a variety of partnerships that will be needed to take full advantage of the digital future, improve market competitiveness, incentivize innovation and job creation.

25. **Component 4. Project Management and Digital Leadership Development (\$2.0).** This component will finance project management activities, associated institutional building and digital leadership development for effective project implementation.

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SAFEGUARDS

A. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

This project is the second phase of the Digital Central and South Asia Regional Program, which initially involves Afghanistan and Kyrgyz Republic. Other countries such as Tajikistan, Kazakhstan Uzbekistan, Turkmenistan, and others could also join the program at later stages. However, The Digital CASA Regional Program will be implemented as a Series of Projects and each phase/project will be based primarily on country readiness.

This project will be implemented in the Kyrgyz Republic. It will connect the domestic fiber optic backbone of this country with other countries in the region and will also further develop the domestic fiber optic backbone. Although the exact locations are unknown at this stage, the client plans to use existing rights of way of the Government including roads and power transmission lines for fiber optic networks.

The environmental and social adverse impacts of this project will be insignificant, minor and reversible in nature. While both environmental and social safeguards issues will be managed through a framework approach, the framework will be further spelled out with additional safeguards tools which will be used throughout the sub-project design and implementation.

B. Borrower's Institutional Capacity for Safeguard Policies

The State Committee of Information Technologies and Communications (SCITC), as a newly established entity, has limited capacity in implementing World Bank projects and complying with the Bank's environmental and social safeguard policies. The SCITC will build the safeguards capacity within the PMO of this project and will assign a safeguards focal person who should be able to oversee the implementation of the ESMF and its instruments as well as conduct trainings on various safeguards topics to the staff of the project, SCITC and contractors. The Bank will also discuss with the client potential citizen engagement tools to be used in this project.

C. Environmental and Social Safeguards Specialists on the Team

Kristine Schwebach, German Stanislavovich Kust, Rustam Arstanov

D. Policies that might apply



Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	Environmental Assessment OP/BP 4.01 is triggered. The physical work under component one may cause adverse environmental and social impacts including occupational health and safety issues. The project aims to finance the expansion and extension of the fiber optic backbone. The client will use existing right of way for this purpose and along the existing roads and power transmission network routes to bury the backbone fiber optic cable. Financing of towers is not foreseen. The risks associated with this kind of infrastructure are generally low, so the project is assigned to environmental category B. Since the project locations are unknown at this stage, a framework approach will be adopted. The borrower will have to develop an Environmental and Social Management Framework (ESMF) for this project. The ESMF will include guidelines and procedures that would avoid, mitigate, or minimize adverse environmental and social impacts as well as spell out the policy, guidelines and procedures to minimize and mitigate the likelihood of the any negative social and environmental impacts.
Natural Habitats OP/BP 4.04	No	The Project does not have any activity involving Natural Habitats.
Forests OP/BP 4.36	No	The Project does not have any activity involving Forests.
Pest Management OP 4.09	No	OP 4.09 on Pest Management is not triggered because Project activities will not involve purchase, use or storage of pesticides, nor will it support the procurement, or use of, or lead to the increased use of other agricultural chemicals.
Physical Cultural Resources OP/BP 4.11	No	OP/B 4.11 on Physical and Cultural Resources is not triggered because there is no indication that physical cultural resources would be affected due to project activities. However, the ESMF will comprise guidelines for Chance Find Procedures according to national laws.
Indigenous Peoples OP/BP 4.10	No	This policy is not triggered as there are no Indigenous Peoples that meet the criteria of OP/BP 4.10 within the project area that could potentially benefit or be adversely affected by the Project's activities.
Involuntary Resettlement OP/BP 4.12	TBD	No land acquisition is expected under this project. However, the possibility and need for triggering OP



4.12 on Involuntary Resettlement will be determined prior to Appraisal. All permanent structures (i.e. Nodes for connecting fiber optic cables) will be constructed on available government land provided that the land in question is free of squatters and encroachment. Further, the cables will be buried along the roads and power transmission lines using the right of way. The Bank policy emphasizes on minimizing involuntary temporary land acquisition and that the project plan provides compensation for any involuntary temporary land acquisition. It is important that the task team and technical experts assess if burying the cables in a private land does not pose any land use limitation or disability. Should OP 4.12 be triggered, a Resettlement Policy Framework (RPF) would be prepared and disclosed prior to Appraisal.

Safety of Dams OP/BP 4.37	No	The Project does not have any activity involving dams.
Projects on International Waterways OP/BP 7.50	No	The Project does not have any activity involving international waterways.
Projects in Disputed Areas OP/BP 7.60	No	The project does not involve any activity in any known disputed area.

E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

May 24, 2017

Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

The client will need to develop an ESMF and potentially RPF which will specify if any additional studies are required to be completed before project appraisal.

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APPROVAL

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