

ENQUIRY REPORT

in the matter of

**BAHRIA UNIVERSITY, MANDATORY SALE OF LAPTOP
COMPUTERS TO INCOMING STUDENTS**

**Submitted by: Farzin Khan, Deputy Director (OFT) Designated as Enquiry Officer
Submitted on: 01 September 2009**

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1. EXECUTIVE SUMMARY/FINAL FINDINGS

The final findings of the Enquiry are:

Mandatory Sale of Laptops

- The Bahria University (the “University”) continued to make the purchase of laptops compulsory in Summer 2008 Semester (June 2008). The University vide its letter No. PRBU/04/2008/65, dated April 11, 2008, para 3, submitted to the Commission that its policy on provision of laptops stands revised and “from next semester, students would not be required to mandatorily purchase laptops from the University stocks”. In the regard, the University is of the view that its commitment for revision of policy from “*next semester*” applied to Fall 2008, being the regular induction time for the University and not to Summer 2008.
- No evidence for mandatory sale of laptop computers in Fall 2008 Semester (August 2008) or thereafter.

Payment of Rebate to Students who purchased Laptops on Installments

- The University, as such, failed to understand and implement rebate payment as directed by the Order of the Commission. Compliance failure was noted in the following areas;
 - ✓ Calculation of Rebate amount for each student
 - ✓ Payment of Rebate on Pro-rated basis
 - ✓ Rebate paid through future installments
 - ✓ No Rebate paid for Interest already paid till the passing of the Order
 - ✓ Omissions and Errors in Payments of Rebate amount to students

2. INTRODUCTION

An Enquiry was initiated to report the Compliance of the Order dated July 24, 2008 in the matter of the Bahria University, compulsory sale of laptop computers to incoming students. The undersigned was designated as the Enquiry Officer and Mr. Arsalan Vardag, Chartered Accountant/ACA, Partner *Tariq Abdul Ghani & Co.*, Chartered Accountants ("Mr. Vardag") was nominated to assist the undersigned in the investigation.

The undersigned, with the assistance of Mr. Vardag, conducted a through investigation to establish the status of compliance. Mr. Vardag submitted a report of the findings of this investigation on September 01, 2009. This Enquiry report is based on these findings and contains extracts of the investigations as submitted by Mr. Vardag.

3. BACKGROUND

In March 2008 the Commission took *suo-moto* notice of a news item, according to which the University had made it mandatory for all incoming students to purchase Laptops imported by the University. This practice of tying the purchase of laptops with the provision of educational services appeared, *prima facie*, to violate Section 3 of the Competition Ordinance, 2007 ("the Ordinance"). During March – May 2008 the Commission conducted an enquiry into the issue and obtained details of the same from the University. In June 2008 the Commission conducted a hearing whereby the University was provided an opportunity of being heard.

The Single Member of the Commission issued Order in the matter on 24 July 2008 discussing in detail various aspects of the issue. The relevant paras of the Order are reproduced below:

Para 29 "As to the students who purchased laptops on installments and were forced to accept loan on 12.65% interest rate, I find the loan conditions unfair to the students. While educational loans are not easily available in Pakistan, a survey of the regional markets suggests that an educational loan for up to Rs. 100,000/- are available to students at 0 to 5~8 percent. I am therefore inclined to give students a rebate, under section 31 of the Ordinance, of approximately 5% out of the 12.65% interest rate charged by the University. Thus, the University shall pay back to the students, who purchased laptops on installments, an amount totaling Rupees ten million (Rs. 10,000,000/-) pro-rated on the bases of the interest amount paid so far, and to be paid in future by each student."

Para 30: "The University had agreed in the hearing to pay back Rupees ten million back to the students who purchased the laptops on installments. The University shall make a re-payment scheme and submit a compliance report to the Commission within one month from the date of this Order."

Para 32: "The University shall desist from making the purchase of laptops compulsory to the students in the future and shall pay to students rebate as mentioned in paragraph 29 above. The University shall also submit a compliance report in terms of paragraph 30 above."

During September – October 2008 various letters were exchanged between the Commission and the University regarding submission of Compliance Report as required under Para 30 of the Order and full implementation of the Order. The University repeatedly gave assurances of implementation of the Order in "toto". Later during May 2009 the Commission on receipt of complaints from some students, again enquired the University regarding implementation of the order to which the University again gave its assurances regarding implementation of the Order "in letter and spirit".

However, the Commission felt that in view of various complaints received from some students and unsatisfactory replies/explanations given by the University regarding implementation of the Order, an Enquiry should be conducted to ensure compliance with the Order. The Commission also decided that in this instance, in addition to appointing an Enquiry Officer of the Commission, **the services of a financial expert i.e. a Chartered Accountant should also be obtained, for assistance of the Enquiry Officer.**

4. SCOPE OF ENQUIRY

Various relevant documents including communication between the Commission and the University were reviewed for the purpose of the enquiry. Correspondence between the Commission and the University upto the date of hearing, the Order issued by Single Member of the Commission, the documents submitted by the University after the issuance of the Order, and communication between the Commission and the University after the issuance of the Order were all taken into consideration before initiating a proper investigation in the University premises.

A list of documents (Attached as Annexure A) required from the University to establish compliance status was drawn by Mr. Vardag after detailed discussion with the undersigned.

The undersigned alongwith Mr. Vardag conducted numerous visits of the University for four weeks, from 31 July 2009 till 27 August 2009. The undersigned alongwith Mr. Vardag also visited Karachi Campus of the University. During these visits the undersigned, as Enquiry Officer, collected information and records from the following University officials;

Islamabad Campus

- Rear Admiral (R) Shahid Latif HI (M) – Pro-Rector
- Captain (R) Tashfeen Riaz – Director Finance
- Lt Commander (R)– Zahid Maqbool – Laptop Incharge

- Mr. Rizwan Amir – Manager MIS
- Mr. Shafqat Ullah – Finance & Audit Manager
- Sub Lieutenant (R) Muhammad Ilyas – Bursar (Accounts Officer)

Karachi Campus

- Captain (R) Ashfaqe Agha, Director Karachi Campus
- Captain Raja Javed Afzal, Director National Centre for Maritime Policy Research (NCMPR)
- Dr. Zainab F. Zadeh, Director, Institute of Professional Psychology
- Hony Lieut (R) Muhammad Latif, Accounts Officer, Karachi Campus

All documents/records obtained from the University Officials for the purpose of the Enquiry are duly stamped and signed by the concerned officials. The list of documents required, with details of those obtained or refused, including comments, duly signed by the Pro-Rector of the University is available, as detailed above, in Annexure A. Inventory List of documents/records obtained in Karachi is attached as Annexure B.

All original documents/records (physical) obtained from the University alongwith a copy, duly provided with the respective findings of Mr. Vardag, are enclosed with this Report as originally submitted while documents/records obtained in electronic form are also enclosed with this report in CD as originally submitted by Mr. Vardag.

During the course of enquiry various files of students were also reviewed to whom laptops were sold while inquiry was also made from some students regarding repayment of rebate and continuation of mandatory purchase of laptops through direct and telephonic interviews.

5. COMPLIANCE REGARDING MANDATORY PURCHASE OF LAPTOPS

The Enquiry provided proof that the University continued to make purchase of laptops compulsory to the students in Summer 2008 Semester. The National Centre for Maritime Policy Research (NCMPR), Karachi of the Bahria University made it mandatory for the students of MBA (Maritime) of Summer 2008 Semester to purchase laptops from the University. Hence, in June/July 2009 eleven (11) students of Maritime MBA of NCMPR were forced to purchase laptops at the time of admission. List of Students is attached as Annexure C.

In this regard the following details are relevant

- Letter No PRBU/04/2008/65 dated 11 April 2008 stating that
“Notwithstanding the above, Bahria University **has** revised its policy on provision of laptops. **From the next semester**, Students would not be required to mandatorily purchase laptops from the University stocks”
- Para 31 of the Order dated July 24, 2008
“... However, the University pleaded ignorance and submitted that **as soon as it received the notice** of the Commission, it **stopped** the mandatory sale of laptops to the incoming student”
It is relevant to note that the hearing was held on 16 June 2008 when this statement was made while first notice of the Commission was given on 4 March 2008.

In May 2009 upon receipt of a complaint from a student of MBA (Maritime) of Summer 2008 of NCMPR, the Commission asked the University to explain its position, the University vide its Letter No PRBU/05/2009/314 dated 21 May 2009 stated that

“In April 2008 and during hearing on 16 June 2008 the University had confirmed that a revised Laptop Policy **will be** implemented w.e.f. next semester i.e. Fall Semester which was to commence in Sept 2008. Accordingly a notification to this effect was issued on **24 June 2008** (copy enclosed). The purpose of this notification was to discontinue mandatory sale of Laptops to students w.e.f. Fall Semester 2008.

The complainant Mr. Muhammad Umer Azhar student of MBA-3 (Maritime) had joined NCMPR (Bahria University) on **21 June 2008 before the issuance of revised instructions** by the University Headquarters. As such the new policy on Laptops was not applicable in his case”.

During the course of this enquiry, the University further clarified through its letter addressed to the Enquiry Officer, No PRBU/08/2009/376 dated 25 August 2009 stating that:

“Summer Semester is optional for students and as a policy matter no laptop fee is charged from any student, only course fee is charged.

Certified that no laptop fee was charged from students during Summer Semester 2008/2009.”

A review of the above statements show clearly that the University had not revised its policy of mandatory purchase of laptops for incoming students either at the time of receipt of first notice of the Commission i.e. 4 March 2008 (as submitted at the hearing), or on 11 April 2008 (as stated in the said letter) or even at the time of hearing i.e. 16 June 2008. In fact the only instruction by the University to discontinue mandatory purchase of laptops by the students was issued through a letter no RBU/100/210 dated 24 June 2008 by Commodore (R) Mumtaz Raza SI(M), Registrar obtained during the course of the Enquiry.

It may also be noted that the list of students of MBA (Maritime) of NCMPR was not provided along with the list of other students of Karachi Campus. This information was obtained by the undersigned during their visit to Karachi Campus.

During the course of the enquiry and investigation of all relevant records, no evidence has been found that the University has made purchase of laptops compulsory to the students in Fall 2008 Semester i.e. starting from August/September 2008 and thereafter. However, the University

6. OBSERVATIONS REGARDING INTEREST RATE AND AMOUNT OF REBATE

The observations below have been submitted as expert opinion of Mr. Vardag and given hereunder for context.

6.1. Incorrect Interest Rate Quoted

It is observed that the interest rate (12.65%) quoted by the University to the Commission as applicable interest rate on installment sale is not correct. The interest rate of 12.65% has been calculated erroneously by disregarding installments paid over the life of the loan.

The interest rates calculated by the undersigned with the assistance of Mr. Vardag, on the basis of repayment schedule provided by University, keeping into consideration the installments to be paid over the life of the loan is following (Calculations attached as Annexure D):

Level	Semester	Tenor of Loan	Principal	Interest	Total	Effective Interest Rate
Masters	Spring 2007	2 years	53,000	13,400	66,400	34.95%
Masters	Fall 2007 & Spring 2008	2 years	56,500	14,300	70,800	34.98%
Bachelors	Spring 2007	4 years	53,000	27,000	80,000	27.82%
Bachelors	Fall 2007 & Spring 2008	4 years	56,500	28,700	85,200	27.74%

It may also be noted that the Principal amount had been increased from Rs. 49,000 in Fall 2006 to Rs. 53,000 in Spring 2007 (an increase of 8.16%) and again increased to Rs. 56,500 in Fall 2007 (an increase of 6.6%). This increase in prices is also reflective of interest amount included in the Principal each Semester.

6.2. Amount of Total Rebate

According to our calculations, the total amount of rebate based on the number and composition of students (1,642 students) is following:

- Rs. **15.76 million** based on a 5% reduction in the interest rate from 12.65% and using the incorrect method of disregarding installments paid over the life of the loan, as explained above. (Detailed working attached as Annexure E).
- Rs. **32.44 million** based on using effective interest rate of 7.65% while keeping into consideration the installments to be paid over the life of the loan. (Detailed working attached as Annexure F).

It is noted that the Commission had capped this rebate to Rs. 10.0 million only.

7. COMPLIANCE REGARDING PAYMENT OF REBATE TO STUDENTS

It is concluded as a result of this Enquiry that the Order regarding payment of rebate of Rs. 10,000,000 (Ten million) to the students, who purchased laptops on installments, pro-rated on the basis of the interest amount paid so far, and to be paid in future by each student, has not been properly implemented.

The above conclusion is based on following observations gathered during the course of the Enquiry and also submitted by Mr. Vardag in his findings. Details of each observation are given in paras referenced below:

- The number of students reported by the University to the Commission at the time of hearing was 2,327 while the University records, also submitted to the Commission vide its letter No. PRBU/04/2008/163 dated August 26, 2008, show only 1,642 students to whom rebate was planned to be paid. The difference of 685 students has been accepted by the BU as a mistake. (Para 8.1)
- The amount of rebate calculated to be paid by the University to each student has been calculated arbitrarily (Rs. 6,090 i.e. Rs 10,000,000 divided by 1,642) without consideration of interest rate or interest amount paid/to be paid by the Students. (Para 8.2)
- Included in the list of students (1,642 students) were 157 students who had already defaulted on their installments and to whom the University did not plan to pay any rebate. Yet, these 157 students were included in the total 1,642 students to whom the University submitted to the Commission to be paying rebate. (Para 8.3)
- The University did not pay back the amount of rebate to the students proportionate to the interest already paid by them as specified in Order. According to our calculation, the rebate that should have been immediately paid is approx. Rs. 3.63 million. (Para 8.4)
- The University did not make efficient and effective arrangements to ensure that the Rebate should be paid to all students in Fall 2008 (August 2008), to whom laptops were sold on installments during the compulsory regime. According to our calculations, 671 students were not paid rebate amounting to Rs. 1.178 million in August 2008. (Para 8.5)
- Incorrect rebate amounts were paid to at least 122 students due to human mistakes/system errors. (Para 8.6)
- The University could not provide information on the total amount of rebate paid to the students to date and the total amount of rebate to be paid in the future. According to our calculations, based on the information provided by the University, the total amount of rebate paid to date is approx. Rs. 3.23 million and the total amount of

rebate to be paid in the future is approx Rs. 3.46 million making the total amount of rebate to be Rs. 6.69 million. (Para 8.7)

7.1. Incorrect Number of Students Reported

As given in the Order (para 20), at the time of hearing the University reported that the number of students to whom laptops were sold on installments were 2,327 however the schedule submitted by the University vide letter No PRBU/04/2008/163 dated 26 August 2008 showed only 1,642 students to whom rebate was planned to be paid.

In this regard, during the enquiry, the Bahria University informed that at the time of hearing incorrect number of students was reported to the Commission. The University in its letter no PRBU/08/2009/368 dated 17 August 2009 stated that:

“Regarding the number of students to whom laptops were sold under the mandatory scheme, the University would like to clarify that the total number of such students is 1,642 only. The **number quoted to the COMMISSION at the time of hearing** i.e. 2,327, also specified in the Order dated July 24, 2008, **was not accurate**. The difference between the two figures i.e. 685 can be partially attributed to Fall 2006 Students i.e. 308 students, to whom laptops were sold under the Optional Scheme incorrectly included in the number provided to the COMMISSION and the remaining difference of 377 was due to **calculation mistake**.”

7.2. Incorrect Rebate Calculation

It is observed that the University while calculating the amount of Rebate for each student has disregarded the tenor of loan which has a direct effect on the amount of interest charged to the student and had decided to arbitrarily give a rebate of Rs. 6,090 to each student.

The table below summarizes the different amounts payable by students of Masters and Bachelors in respect of principal and interest.

Level	Semester	Tenor of Loan	Principal	Interest	Total	Rebate
Masters	Spring 2007	2 years	53,000	13,400	66,400	6,090
Masters	Fall 2007 & Spring 2008	2 years	56,500	14,300	70,800	6,090
Bachelors	Spring 2007	4 years	53,000	27,000	80,000	6,090
Bachelors	Fall 2007 & Spring 2008	4 years	56,500	28,700	85,200	6,090

During the enquiry it was established that the University decided to implement the Order as simply as possible. The University in its letter no PRBU/08/2009/368 dated 17 August 2009 stated that:

“The University decided that the total amount of rebate of Rs. 10,000,000 to be paid to the students as ordered by the COMMISSION would be **distributed equally** among the 1,642 students, which came to Rs. 6,090 per student.”

It is relevant to reproduce the relevant para of the Order below:

Para 29 “As to the students who purchased laptops on installments and were forced to accept loan on 12.65% interest rate, I find the loan conditions unfair to the students. While educational loans are not easily available in Pakistan, a survey of the regional markets suggests that an educational loan for up to Rs. 100,000/- are available to students at 0 to 5~8 percent. I am therefore inclined to **give students a rebate**, under section 31 of the Ordinance, of **approximately 5% out of the 12.65% interest rate charged** by the University.

In our view the amount of rebate should have been calculated keeping into consideration the amount of interest charged to the students.

7.3. Defaulters Included in List of Students

The University had incorrectly included in the list of students to whom rebate would be paid (1,642 mentioned above) those students who had already defaulted on their installments at the time of calculation of Rebate by the University (August 2008). The number of such students is 157 and the amount of rebate for such students comes to **Rs. 956,130** which has, consequently, not been paid by the University. (Annexure G).

7.4. Rebate Not Paid – For Interest Already Paid

The University did not pay back the amount of rebate to the students proportionate to the interest already paid by them as specified in the Order. The Order of the Commission stated that:

Para 29: “.....Thus, the University shall pay back to the students, who purchased laptops on installments, an amount totaling Rupees ten million (Rs. 10,000,000/-) **pro-rated on the bases of the interest amount paid so far, and to be paid in future by each student.**”

During the course of the enquiry it was ascertained that the University decided to implement the Order as per its own interpretation. The University in its letter no PRBU/08/2009/368 dated 17 August 2009 stated that:

“It was also decided that the **manner of payment of rebate would be an equal reduction of Rs. 6,090 in the future installments to be paid to the students who continued to pay installments** after August 26, 2008.”

However, it is also important to point out that the Commission in its letter dated 7 October 2008, raised this issue. It is interesting to note that the University in its letter No PRBU/10/2008/182 dated 14 October 2008 stated that:

“Laptop installment duly rebated has already been collected alongwith the Fall 2008 Semester Fee. However, **Rebate on pro-rata basis with necessary adjustments shall be enforced with fee collection of Spring 2009 Semester.**”

There is clearly a conflict between various statements of the University and until now rebate has not been paid proportionate to the amount of interest already paid by the students.

According to our calculations the amount which should have been repaid by the University to the students immediately is **approximately Rs. 3.63 million** (based on rebate per student Rs. 6,090 as per University’s calculations). (Annexure H)

7.5. Rebate Not Paid To Students in Fall 2008

It is observed through evidence that various students were not given rebate as per the University’s own repayment plan alongwith Fees to be paid by students in Fall 2008 Semester (i.e. starting from August/September 2008). According to our calculations 671 students were not given rebate amounting to approx **Rs. 1.178 million**. (Detailed working is at Annexure I).

On enquiry, the management of the University informed that the instructions to give rebate to students were issued vide letter number no. FBU/2006/475/168 dated 26 August 2008 and fee challans issued before that date and a few days after that date included un-rebated installment for laptops. The management stated that the rebate not paid would be paid at the time of payment of security deposit when the student is leaving the University.

However, it was noted that the University in its letter no PRBU/10/2008/180 dated 6 October 2008 replying to the Commission’s letter dated 25 September 2008 forwarding complaint that rebate has not been paid, stated that:

“**It is certified that new fee slips** issued to students (who were given compulsory laptops on installments) **includes reduced 6 monthly installments** as per instructions reported vide letter at reference ‘B’ above. Therefore the Commission’s decision is being implemented in toto”.

It was also noted that the University in its letter no PRBU/10/2008/182 dated 14 October 2008 replying to the Commission’s letter dated 7 October 2008 raising questions regarding the manner of payment of rebate, stated that:

“Laptop installment **duly rebated** has already been collected alongwith the Fall 2008 Semester Fee. (emphasis is added).

It was further observed that in Spring 2009 the Karachi Campus realizing its mistake of not giving rebate in Fall 2008 paid rebate to students in the following manner:

- Pay Orders to 56 students amounting to Rs. 341,040 whose education was complete and had left the University. (Annexure J)
- Adjustments in fees of 570 students amounting to Rs. 1.516 million. (Annexure K). It may however be noted that the Karachi Campus of the University erroneously gave double rebate to these students.

It is hence concluded that the University did not make efficient and effective arrangements to ensure that the Rebate should be paid to all students in Fall 2008 (August 2008) to whom laptops were sold on installments.

7.6. Incorrect Rebate Amount Paid To Students

It was found with evidence that 122 students were given incorrect rebate amounts by the University. (Annexure L). On enquiry, it was informed by the management of the University that these mistakes are due to human mistakes/system errors. The management stated that all the mistakes would be corrected in future installments and at the time of payment of security deposit when the student is leaving the University.

7.7. Total Rebate Paid and Payable

The University could not provide us information on the total amount of rebate paid to the students to date and the total amount of rebate to be paid in the future.

According to our calculations, based on the information provided by the University, the total amount of rebate paid to date is approx. Rs. 5.09 million and the total amount of rebate to be paid in the future is approx Rs. 2.7 million making the total amount of rebate to be Rs. 7.79 million (Detailed calculation at Annexure M). It may be noted that these amounts are estimates based on the information provided by the University.

7.8. Rebate to Students Converted from Installments to Lumpsum Basis

Details of students who purchased laptops either on lumpsum basis or who purchased laptops on installments but later converted it into lumpsum basis (conversion cases) were not provided by the University for the purpose of the Enquiry.

The management of the University stated that the scope of the Enquiry was limited to ensuring that the University has discontinued the policy/practice of making the purchase of laptops compulsory to the students and the amount of rebate is being paid to the students who had purchased laptops on installments, as given in the Order, and therefore conversion cases are not in the scope of the enquiry.

On enquiry regarding whether rebate was paid to conversion cases, it was reported that the University decided to implement the Order as simply as possible. The University in its letter no PRBU/08/2009/368 dated 17 August 2009 stated that:

- “Regarding Students who purchased Laptops on installments under mandatory sale scheme, however later converted into lump sum payment method before 26th August 2008, the University has not paid any rebate to such students. Such students are not included in the list of students (1,642 in total) to whom rebate was planned to be provided.
- Regarding Students who purchased Laptops on installments under mandatory sale scheme, however later converted into lump sum payment method after 26th August 2008 but before payment of any reduced installment, the University has not paid any rebate to such students.
- Regarding Students who purchased Laptops on installments under mandatory sale scheme, and paid one or two reduced installments (rebated installments) after 26th August 2008 and thereafter converted into lump sum payment, the University has not paid any further rebate to such students.”

8. CONCLUSION/RECOMMENDATIONS

The Enquiry Report concludes partial compliance of the Order dated July 24, 2008 of the Commission. The compliance required from the University vide Order dated July 24, 2008 can be categorized in two parts; (i) discontinuation of forced/compulsory sale of laptops to incoming students, and (ii) payment of rebate to students who purchased laptops from the University on installments as specified in the Order.

8.1 Discontinuation of forced/compulsory sale of laptops: As detailed in the Part 6 of the Enquiry report, compliance failure is observed in Summer 2008 wherein eleven (11) students of Maritime MBA of NCMPR were sold laptops in June/July. Although the Order was issued on 24-07-08, the University filed its declaration of discontinuation of mandatory sale of laptops to the students and implementation of revised policy from next semester to the Commission on April 11, 2008.

In view of the above, it appears that the University has given a false statement to the Commission that “*as soon as it received the notice of the Commission, it stopped the mandatory sale of laptops to the incoming student*”, vide its letter dated April 11, 2008 and in the hearing before the Commission on June 16, 2008. It is pertinent to mention here that at the relevant time the next semester was summer semester and during that semester the University made mandatory sale of laptops to the students of Maritime MBA of NCMPR. It appears that the University has made a false statement before the Commission to get a lenient treatment from the Commission and has also contravened the declaration given by the University vide letter dated April 11, 2008.

8.2 Payment of rebate to the students: The students who purchased laptops on installments as specified by the Order of the Commission; compliance lapses have been observed and recorded at various levels. The major compliances lapses are:

- non-payment of rebate for interest already paid by the students;
- disproportionate payment of rebate to students; and
- total projected rebate payment not equaling to Rs. 10/- million.

In view of the above, it appears that the University has not complied with the directions given by the Commission in its Order dated July 24, 2008; as to payment of rebate to the students. Further more; they have also made false statements to the Commission that the rebate has been paid to the students as per the directions contained in the Order of the Commission.

Keeping in view the above conclusions, it is hereby recommended that the proceedings may please be initiated against the University for violation of the provisions of clauses (b) & (d) of sub-section (1) of Section 38 of the Ordinance.



(Farzin Khan)

Deputy Director (OFT)/Enquiry Officer
September 01, 2009