

**Bharti Airtel's response to TRAI Consultation paper on issues relating to blocking of IMEI for lost / stolen mobile handsets**

- 1. In order to reduce/discourage mobile theft do you think the blocking of IMEI is an effective solution? Please give reasons.**

**Bharti Airtel's Response:**

- The blocking of IMEI is an effective solution to discourage mobile theft in the Country. This is important considering the fact that the mobile industry is adding monthly subscriber base of approx 18-19 million and there has to be a mechanism to curb mobile theft thereby reducing the security risk.
- Blocking of IMEI will also prevent the usage of stolen handset which is re-sold in the market. The another benefit is that the customer can get his handset blocked if he wants to dispose off his handset in order to ensure that it will not be misused at a later stage.

- 2. In case blocking of IMEI is implemented, to what extent load on the network will increase? Please give details**

**Bharti Airtel's Response:**

Yes there is an additional load on the network, if blocking of IMEI is implemented. It is also important to mention that we have already installed EIR in our network as per the DoT's instructions and are continuously increasing the capacity as and when the requirement is coming.

- 3. In your opinion who should maintain the CEIR? Please give reasons.**

**Bharti Airtel's Response:**

- Ideally, the Government should have the ownership of CEIR as the same should also be used by the security agencies. However, the CEIR can also be maintained through third party authorized by TRAI/ DoT and the same may run on revenue sharing arrangement set by the Authority.
- It is also submitted that the central EIR database should be directly in sink with the GSMA database having the White/Grey/Black list of all the handsets available in the market. This will reduce the efforts/risk of error/cost of updating EIR database separately by each service provider

4. **Should the CEIR be maintained at national level or zonal level? Provide details including the estimated data size.**

**Bharti Airtel's Response:**

- We suggest that CEIR should be maintained at national level with disaster recovery site. This would simplify the interconnection /synchronization among the database of different service providers and will also make entire system robust and cost effective in terms of both Capex and Opex.
- Further, we estimate that the size of the database would be approx 3-4 million customers.

5. **Please comment on cost and funding aspects of Centralized EIR? Please provide detailed cost estimates?**

**Bharti Airtel's Response:**

- The implementation cost of CEIR could be borne by Government or the third party appointed by the Government.
- The cost of deploying the CEIR is estimated around US\$ 4 million.

6. **Should blocking of IMEI /ESN be chargeable from customer? If yes, what should be the charge?**

**Bharti Airtel's Response:**

- Yes, blocking of IMEI/ ESN should be a chargeable service as there is an additional cost involved in:
  - ✓ Upgradation of network to support the new requirement.
  - ✓ Continuous synchronization with the central EIR.
  - ✓ Handling of additional call in the call centers.
  - ✓ Manpower requirements to handle such complaints/ requests
- As regards the charge towards this facility, we propose a cost based approach/model, based on the estimated opex and number of lost handset requests made to the operators; TRAI may suggest the revenue share arrangement between telecom service provider and the third party who will be maintaining the CEIR.

7. **Please give your views on bringing a legislation to prevent reprogramming of mobile devices? In your opinion what are the aspects that need to be covered under such legislation?**

**Bharti Airtel's Response:**

- Before expressing the views on the above, we would like to highlight that the solution of blocking of IMEI by way of CEIR will not help in solving the problem related to cloning of IMEIs. There has been an increased instance wherein the lost handsets are being implanted/cloned with IMEIs of genuine customers. In such an instance, even the above measures of implementation of central EIR will not serve the required purpose.
- Thus, we are in concurrence with the TRAI's view of bringing a suitable legislation to stop/curb the misuse of mobile phones by software reprogramming process. The legislation may make it mandatory for manufacturers/importers to comply with the guidelines related to IMEI. Also, there should be a penalty for the people modifying the IMEI in an unauthorized way.

**8. What should be the procedure for blocking the IMEI?****Bharti Airtel's Response:**

Following is the suggested procedure for blocking the IMEI -

- As a first step, Customer should file an FIR with local police station and obtain the copy of the same.
- Customer place his request for blocking the IMEI at the nearest service provider outlet along with the following documents -
  - i. A Copy of FIR filed with Police.
  - ii. A copy of invoice of the handset mentioning the IMEI number. In case of non availability of Invoice, Handset box/Manual with label mentioning IMEI number may be accepted. In this regard, there is a need to include a suitable clause in the handset manual and the manufacturer may be directed accordingly.
  - iii. A POI (proof of identity) & POA (proof of address) confirming the applicant's identity.
- Post verification of customer credentials, Service provider agents shall process the request and provide acknowledgement slip to the customer mentioning the unique number for his service request. This service request no. can be used by the service provider in specific cases of unblocking of IMEI request from the genuine customer in case they have found their handsets. Please refer to Q9 for detailed process.
- We also propose some timeline to ensure that customer request is acted upon & confirmed back to the customer within 3 working days from the date of receipt of the request.

9. If lost mobile is found, should there be a facility of unblocking the IMEI number? If yes, what should be the process for it? Should there be a time limit for unblocking the IMEI number? Should it be chargeable?

**Bharti Airtel's Response:**

- Yes, Service provider should be given the flexibility of unblocking the IMEI no. in specific cases wherein the reported lost or stolen handset has been recovered by a subscriber / police. However, this facility could be extended to genuine customers only after due diligence/verification by the service provider. This will avoid additional financial burden of purchasing a new handset by the customer.
- For verification process, it is suggested that the service provider should unblock only those IMEI numbers where in the customer has put in the written request along with the acknowledgement slip handed over to the customer at the time of placing a request.
- We also propose timeline of 3 working days from the date of receipt of the request for unblocking the handset & confirmation to the customer.
- Regarding charge towards this facility, we propose cost based charge and the same may be fixed by the Authority.