

COAI COMMENTS ON TRAI CONSULTATION PAPER ON ISSUES RELATING TO BLOCKING OF IMEI FOR LOST/ STOLEN MOBILE HANDSETS

INTRODUCTION

- a) COAI agrees with the Authority that mobile phone theft is a serious problem world over. Various technical methods of securing mobile handsets are being used in some countries with the objective of safeguarding against the misuse of mobile phones after theft.
- b) COAI also agrees that the time has come to put in place certain measures to tackle the problem. We believe the level of security of mobile phones is becoming increasingly important as the mobile phones are also used as payment terminals for M-Commerce.
- c) It is important that although various methods may exist to improve the security of the mobile phones, they should be evaluated for ease of implementation, effectiveness as an anti-theft measure, cost effectiveness as well as their commercial feasibility for both manufacturers and operators.
- d) The operators in India have already installed EIRs in their networks however, to deal with the problem of stolen/ lost mobile handsets, it is important to integrate all the EIRs to a central database (CEIR).
- e) However, creation of National database (CEIR) alone will be ineffective, as stolen handsets may find their way across national borders. TRAI should understand and acknowledge that handsets stolen in one jurisdiction are commonly illegally trafficked for re-sale in another. This, it would be important that **databases must be linked to a central database (CEIR) where a list of stolen/ lost mobile handsets is maintained.**
- f) It is also important to understand that creating a CEIR alone would not solve the problem. There is also a need to have proper legislation in place to stop reprogramming of handsets to stop cloning of IMEI numbers.

ISSUE WISE SUBMISSIONS

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

- a) Blocking of IMEI is an effective solution to discourage mobile theft in the country as it will prevent the usage of stolen handset which is re-sold in the market to some extent. However, it alone cannot serve the purpose as the handsets can be easily re-programmed and sold in the market.
- b) Thus, it is important to have a legislation stop/curb the misuse of mobile phones by software reprogramming process. It is submitted that the Authority will first have to put

in place a suitable legislation and only once that is done that suitable actions can be taken towards enforcement.

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

- a) In case blocking of IMEI is implemented, there would definitely be additional load on the networks of the operators. Since, the database (CEIR) from where it has to be checked whether the IMEI is blocked or not would be huge, the hold time would be more and hence the delay thus leading to increase in the cost.

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

- a) The CEIR should be owned and maintained either by the Government or the TRAI. The same could also be done by a third party authorized by the Government/ TRAI. This is also advisable as this database would have crucial information and secured direct access can be provided to the security agencies too.
- b) It is also submitted that the CEIR database should be linked to 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.

This would also ensure that a global database of stolen devices is maintained. This also allows devices stolen in India to be blocked in other countries thereby maximising the value of blacklisting as it is generally recognised that stolen devices travel across national borders.

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

- a) We believe that the CEIR should be maintained at national level with disaster recovery site. This would simplify interconnection /synchronization amongst the databases of different service providers and will also make entire system robust and cost effective in terms of both Capex and Opex.
- b) This would also prevent the ambiguity of having different databases available with different service providers. There would be just one central point for data upload and download.

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

- a) It is submitted that since this initiative is taken in the interest of the national security, the funding or the costs of this exercise should be borne by the Government.
- b) Apart from setting up the CEIR, there would be other additional costs, which the service providers would have to incur. These are:

- Calls made to customer care centres by customers reporting stolen devices.
- the implementation of a programme to block stolen devices will require some additional investment.
- operators to build provisioning capabilities between their front end CRM systems and their EIRs to facilitate blacklisting by front line customer case staff in response to reports of loss or theft from their customers.
- Cost to build mediation platforms between the CEIR and local EIRs

It is suggested that these may also be re-imbursed to the service providers by the Government.

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

- a) Yes, blocking of IMEI/ ESN should be a chargeable service.
- b) 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.
- c) Moreover, it is important to charge for this service to avoid frivolous callers and avoid misuse.

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?

- a) Legislation making reprogramming of a handset an offence is absolutely necessary. This would also prevent cloning of IMEIs of handsets of genuine customers.
- b) Internationally legislations exist to prevent reprogramming of mobile devices. The same should be suitably implemented in India to meet the specific needs of the nation. The legislation may make it mandatory for manufacturers/importers to comply with the guidelines related to IMEI and also factor in criminal proceedings against the people modifying the IMEI in an unauthorized manner.

8. What should be the procedure for blocking the IMEI?

- a) The following procedure may be adopted for blocking the IMEI –
 - Customer should file an FIR with local police station and obtain the copy of the same.
 - Customer should 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's authorized 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. Detailed process for unblocking is dealt with in the next question.
- Following the above steps, the requested IMEI would be blocked.

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?

- a) Yes, the service providers 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.
- b) 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.
- c) Regarding charge towards this facility, we propose cost based charge similar to the one for blocking the IMEI.
