

Dear Sirs,

Please find below the comments for the consultation paper release by TRAI under the subject:

TRAI Consultation Paper on issues relating to blocking of IMEI for lost/stolen mobile handsets

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

[Response]

Yes, as has been followed by a number of countries, the use of IMEI number alongwith right legislation can result in discouragement to mobile theft. In India also, instances of phone snatching etc are growing and a technical solution can help bring down the incentive for theives.

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

[Response]

There will not be much extra load. When the mobile registers with the network, at that time the network has the option of checking with the EIR whether the mobile is authorised or not. Since this registering process is done only few time and not on a per-call basis, hence there should not be too much impact on the network.

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

[Response]

The same mechanism as done currently for storing mobile portability information could be used. In fact it may be possible to re-use the mechanisms already prepared for the number portability in terms of databases etc by enhancing the same or by using same interfaces to provide this extra information. This can result in significant saving in terms of re-use of interfaces between the CEIR and the various network providers.

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

[Response]

The same mechanism as done currently for storing mobile portability information should be used. i.e. similar to the number portability providers, there could be two zones holding the data of mobiles in the black list i.e reported as blocked. By enhancing the number portability solution with CEIR, significant saving in terms of cost to the network providers and time-to-implement can be achieved.

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

[Response]

There may be multiple ways for costing.

One way could be at the time of mobile phone sale, a charge of 15-20 rupees similar to the portability charge be paid by the consumer. This money is paid by the equipment seller/manufacturer to the CEIR service provider. Or it could be a opt-in service where the mobile connection holder can ask his service provider for enrollment to the CEIR register by paying a one time fee.

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

[Response]

Yes, it should be charged. There should be a one-time fee to enroll into the CEIR. This fee may be tied with the cost of the phone at the time of phone sale

(People with expensive phones will be willing to pay more). Or it could be taken by the network operator for enrolling into this service and passed onto the CEIR service provider. The charges maybe arrived at in similar fashion as for the number portability.

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?

[Response]

Only blocking the IMEI is tooth-less unless it becomes a criminal offence to re-program or change the IMEI number on the phone. Hence appropriate legislation should be brought in. Since there are national security issues in changing the IMEI which prompted the govt to implement the EIR, the legislation should go for high fines and scope for jail term to dissuade anyone breaking the law.

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

[Response]

a. The person enrolls into the scheme by paying a one time fee. This enrollment maybe at the time of phone sale or buying a connection from the network operator.

In case of loss/theft of phone, the subscriber makes a single request to block the SIM and IMEI for his connection.

Only Identity match should be made for the subscriber and there should not be requirement to produce any FIR or related documents from Police etc. This is because it is a cumbersome process and if the identity is matched, the operator should not have any problem to block the phone. There may be a maximum time allowed for 24 hours for both SIM and IMEI blocking.

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?

[Response]

Yes, there should be a mechanism to unblock the IMEI number, The process should be similar as for the blocking request i.e. the subscriber approaches the telecom service provider to unblock IMEI number alongwith his identity proof. Note that unblocking request should only be allowed from same person and to the same provider who had done the blocking.

Normally, the blocking of IMEI would be accompanied by blocking of SIM as well and the unblocking of SIM or providing a new SIM is a charged service by operators. Similarly, The unblocking of IMEI number should also be charged with the money going to CEIR service provider.

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Regards,

Manu Sood