



21st December 2012

Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg, Old Minto Road,
New Delhi – 110 002

Kind Attention: Mr. Raj Pal, Advisor (F & EA).

Subject: Response to Consultation Paper on Deactivation of SIMs due to Non Usage.

Dear Sir,

This is with reference to the Consultation Paper dated 30th November, 2012 on the above mentioned subject. In this consultation paper, the Authority has rightly mentioned to devise a regulatory framework to protect the reasonable interests of both; the operators as well as the customers. Tata Teleservices firmly believes to be fair and transparent to its subscribers and therefore, welcomes TRAI Consultation Paper to standardize the SIM deactivation criteria across the industry.

Accordingly, Tata Teleservices's point wise response is as follows:

1. **What period of continuous non-usage of a SIM should be kept as criteria for deactivation by the telecom service provider?**

- (i) 60 days
- (ii) 90 days
- (iii) 120 days
- (iv) 150 days
- (v) 180 days
- (vi) Any other

TTL: - Mobile numbering series is a scarce and limited national resource. We believe that such numbers should be optimally utilized and hence should be reallocated to a new customer when not being used by a dormant customer. Accordingly, we recommend that 60 days period of continuous non-usage of a SIM should be kept as criteria for deactivation by the TSP. This should be applicable to all existing and new subscribers irrespective of the tariff and validity plans they have chosen. This is important because many customers are Life Customers and are not using connection.

2. **Which (one or more) amongst the following should be included in the scope of activity with regard to the criteria for deactivation of SIMs upon non usage?**

- (i) Outgoing voice call
- (ii) Incoming voice call
- (iii) Outgoing video call
- (iv) Incoming video call

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- (v) **Outgoing SMS**
- (vi) **Incoming SMS**
- (vii) **Data transfer**
- (viii) **Activation of a voucher**
- (ix) **Switching the connection 'ON' by powering on the handset and SIM**
- (x) **Any other**

TTL: - We recommend that amongst the above options, minimum one activity i.e. outgoing voice call/ incoming voice call/ out-going SMS/ Data transfer/ Activation of Voucher in running 60 days should be included in the scope of activity with regard to the criteria for deactivation of SIMs upon non usage. This should be applicable to all existing and new subscribers irrespective of the tariff and validity plans they have chosen.

3. Which method(s) should be used for communicating the criteria of deactivation of SIMs to the subscribers in a transparent manner?

TTL: - We are of the view the method to communicate the criteria of deactivation of SIMs should be communicated to the subscribers in a transparent manner like printing the criteria on SUK/CAF/leaflets, sending SMS and OBD to the existing subscribers, notice on website and retail points and press releases, wherever applicable.

4. Should the condition of deactivation due to non-usage apply in all cases, or should it apply only in those cases where such a condition formed part of the contract at the time of enrolment?

TTL: - The condition of deactivation due to non-usage should apply in all cases and all type of tariff plans. However, if a customer gives in writing that he is going abroad or he would not be using the SIM for a particular period due to other reasons and would like to retain the number by paying a nominal monthly retention charges, then such condition of deactivation should not be applicable in his case.

5. Whether there is a requirement of a connection retention scheme for the wireless subscribers who wish to retain their mobile connections active/ live even after long continuous periods of non-usage? If yes, what should be the terms, conditions and charges under such a scheme?

TTL: - We are of the view that in the interest of both the subscribers and the service providers, there should be a connection retention scheme for keeping a mobile connection active/ live regardless of continuous non-usage beyond 60 days by payment of nominal connection monthly retention charges. The cost of acquisition of a subscriber and maintaining it in various systems like billing system, Customer Resource management (CRM) platforms deployed by the TSPs in their network is



substantial. Thus, there is case to give the existing subscriber another opportunity to become active on the network by levying a nominal monthly retention charges. The terms and conditions and monthly retention charges should be under forbearance.

6. Whether the monetary value remaining on a pre-paid SIM should be forfeited upon deactivation of the SIM due to non-usage or it should be refunded/ returned back to the subscriber?

TTL: - It is a well known fact that the operator incurs a huge cost towards subscriber acquisition. This acquisition cost is recovered provided the customer stays with the operator for a significant period. If the customer does not give the monthly revenue to the operator, then the subscriber acquisition cost is borne by the operator. Also, tracing inactive subscriber will add further cost to the operator, which is much more difficult since the customer has been inactive for a long period. To avoid such cumbersome process and to lessen the burden of subscriber acquisition cost on the operator, we feel that the monetary value remaining on the prepaid SIM should be forfeited upon deactivation as it is a mere average of Rs. 6 per deactivated SIM.

7. Whether there is a requirement for specifying a period, within which a wireless subscriber should be allowed to reactivate his SIM that was deactivated due to continuous non-usage? If yes, what should be such reactivation period and other terms & conditions thereof?

TTL: - Yes, there is a requirement for specifying a period of not more than 15 days, within which a wireless subscriber should be allowed to reactivate his SIM that was deactivated due to continuous non-usage of 60 days. The operator should be allowed to levy a nominal reactivation charge on such customers.

We hope that our views will be given due cognizance by the Authority. We would be happy to address any further query in this regard.

Thanking you and assuring you of our best attention always.

Yours sincerely,

Anand Dalal
Senior Vice President – Corporate Regulatory Affairs
Tata Teleservices Limited
And
Authorized Signatory
For Tata Teleservices (Maharashtra) Limited