

Response to the TRAI Consultation Paper on Deactivation of the SIM's due to the non-usage

At the outset, we would like to request the Authority to allow the Service Providers to offer Tariff plans which have usage related conditions. This will not only allow the Service providers to serve the customers in the best possible manner but also help in efficient utilization of scarce number series resource. Most importantly, it will also allow the service providers in meeting the VLR linked criteria set out by DOT for allocation of Number series.

- Since the inception of the licensing regime, DOT had been following a number allocation policy based on HLR criteria.
- DOT issued a new policy which linked the issuance of number series to VLR base criteria of total allocated MSC codes.
- With very limited quantity of number series being allocated to us, it becomes extremely difficult to get the new number series based upon the new criteria.
- Due to the DOT policy on issuance of new number series, we have been facing serious crunch of numbers leading to our business getting severely impacted.
- Moreover, it has been analysed that many of the SIMs that are purchased by customers go into zero usage beyond a certain period after which these numbers are not used again. Hence these numbers can be being deactivated.
- Also there is cost of keeping zero usage numbers in HLR.
- Since service providers are not allowed to report the numbers which goes into the zero usage beyond a certain period for applying for a new number series, hence operators should be allowed to deactivate such numbers.
- We request the Authority to take cognizance of the problem being faced by the industry in running day to day operations because on non-availability of the number series and let the operators continue deactivating the SIMS due to non-usage, provided that the condition is being transparently communicated to the subscriber at the time of subscription.

Further, please find below our point-wise replies to questions raised in consultation paper:

Q1: 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

Uninor Response:

We are of the view that 60 days of continuous non-usage of a SIM should be kept as a criteria for the deactivation by a service provider.

Q2: 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
- (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

Uninor Response:

We suggest that voice calls (Incoming/Outgoing), P2P SMS (Incoming/Outgoing) or data usage, VAS usage or Recharge should be considered in the scope of activity with regard to the criteria for deactivation of SIM's upon non-usage.

Q3: Which method(s) should be used for communicating the criteria of deactivation of SIMs to the subscribers in a transparent manner?

Uninor Response:

The non-usage criteria may be conveyed to the subscribers at the time of enrollment through SUK's (Start Up Kit), through tariff leaflets available at point of sales and through the website as well. Apart from this, as per TRAI direction on publishing the tariff plans in the newspapers, the related conditions (including the non-usage) may also be published.

Q4: 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?

Uninor Response

At present we apply the non-usage condition only to those subscribers to whom the non-usage condition has been exclusive conveyed at the time of subscription. However we would like it to be made applicable to the entire base, including those subscribers who had not subscribed to a plan for which the non-usage condition formed a part, provided they are being well informed/ given suitable notice about this change. This uniformity will further help the service providers to utilize the scarce number series in much better way.

Q5: 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?

Uninor Response

The market dynamics are such that this scheme should be made available to postpaid subscribers only. Also, we believe that the connection retention scheme if any should be driven /determined by market forces and should not be regulated.

Q6: 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?

Uninor Response

Recognizing the fact that the non-usage condition and other related conditions like forfeiture of money are being explicitly conveyed to the subscriber, hence the service providers should be allowed to forfeit the monetary value upon the deactivation of the SIM due to the non-usage.

Q7: 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?

Uninor Response

We believe that there is no requirement for specifying a period, within which a subscriber can get back and reactivate his SIM. It will unnecessarily increase the period for which the number resource remains unutilized. It is always that, before deactivating a particular SIM card, an operator makes all its efforts to retain/regain the customer. At present, once the subscriber is disconnected the number immediately goes into recycling and is being issued to a new subscriber. The period of reactivation of the SIM should be driven /determined by market forces and should not be regulated at all and should be left to the operators to decide.