

15th Dec, 2010



The Telecom Regulatory Authority of India

Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg (Old Minto Road)
Next to Zakir Hussain College
New Delhi – 110 002

Kind Attention: Principal Advisor (MN)

Re: Comments sought by TRAI on "Consultation Paper on Issues relating to blocking of IMEI for lost / stolen Mobile Handsets"

Dear Sir,

This is with reference to the above mentioned subject, wherein the Authority has sought comments on issues relating to IMEI blocking of lost / stolen Handsets. In addition to the response provided by COAI, we would like to submit as follows:

While there is no denying that blocking of IMEI has the potential to act as a disincentive to steal, we feel that the following points need to be considered first before arriving at any decision with respect to implementation of the same:

- a) Many of the stolen mobiles shall start finding their way to countries which have not joined the International IMEI Blacklist. For example, today it is not unusual for a handset stolen in the UK (*which has a legal IMEI Blocking process*) to be resold in an under-developed / developing country which has not yet joined the international IMEI blacklist.
- b) Many softwares to change the IMEI numbers (reprogramming) are freely available on the net. Hence there is a strong possibility of the IMEI number of the stolen handset getting changed before being resold or reused, as also acknowledged by the Authority itself in this Consultation Paper. There is therefore a definite need to bring in legislation with stringent penalties to enable the law enforcement agencies to take action against those indulging in the reprogramming of mobile devices.
- c) As on date, there is no way whereby we can determine whether the IMEI that is being asked to be blocked is a genuine IMEI or a reprogrammed one. This effectively means that if we were to block an IMEI being requested, it could potentially end up blocking multiple subscribers on our networks / other networks across the country, or even internationally if such an arrangement were to develop sometime in future. This, by any standards, would be against the interest of the customer with the legitimate IMEI. It may be borne in mind here that the number of customers with duplicate IMEI's may run into thousands against each of the individual IMEI's. Also, since this issue is of paramount importance we would recommend that the work of maintaining the CEIR be given to an International Agency that already has a fair amount of experience and understanding of



the operator systems and process requirements for IMEI Blocking in addition to having linkages with other EIR's across the Globe.

d) In addition to huge costs in terms of up gradation of networks / systems, IMEI blocking would involve considerable changes in the current customer facing processes, inter-operator escalation issues, handling of subscriber queries on IMEI blocking, etc. This would involve both capital expenditure as well as operating expenditure on an ongoing basis. We feel that with operators already having made huge investments in fulfilling regulatory requirements including MNP, putting in additional investments into making the network / processes ready for IMEI blocking could perhaps slow down the expansion plans of telecom industry.

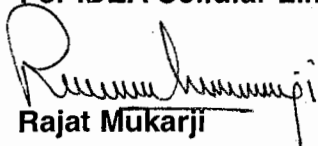
e) Last but not the least, once IMEI Blocking is implemented, there may be a need for "Triple Dipping" within the network, i.e., three different data bases pertaining to MNP, DNDC, and IMEI may need to be dipped into prior to call completion thereby resulting in higher hold times for the customers. Further, this is a capability that is yet to be confirmed as being available on our networks.

In light of the above, we feel the above-mentioned issues be seriously considered and deliberated prior to arriving at any decision with respect to IMEI Blocking.

Thanking you,

Yours faithfully,

For IDEA Cellular Limited.



Rajat Mukarji

Chief Corporate Affairs Officer