Attending to this matter
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Response to TRAI Consultation Paper on *Issues relating to blocking of IMEI for Lost/Stolen mobile handsets*, dated 2nd Nov 2010

Reference: Response to TRAI Consultation Paper on *Issues relating to blocking of IMEI for Lost/Stolen mobile handsets*, dated 2nd Nov 2010

Dear Sir,

We sincerely thank you for offering us the opportunity to provide inputs to the Consultation Paper on a subject that is of grave concern to the general public and will go a long way in mitigating the sufferings of the people who have lost their mobiles and the valuable data stored in them.

We agree with the Authority that if a stolen/lost handset is rendered useless in the hands of unscrupulous elements, and the dissemination of this fact becomes widespread, it will be a big deterrence against stealing of mobile phones.

We have tried our best to address and respond to most of the issues highlighted through this consultation paper:

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

- Yes. If the message is clearly spread that a stolen handset becomes useless (due to blocking by service providers), it will help in curbing the intentions to steal the handset. In addition, it's the only solution available with present technology.

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

- With typical EIR implementation, 0.3 BH IMEICheck/subscriber is normal recommended value. From CANDI, it comes ~ 1% (even less) drop in capacity.

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

- 3PP. A similar approach as is being used in MNP centralized DB also. A 3PP vendor (with previous experience) can professionally manage the CEIR.

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

- Better at national level with geo-redundancy. Then each EIR (of each service provider) has to synchronize only to one Centralized EIR pair. If at zonal level, it can lead to issues in synchronization between different zones.

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

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

- No, the subscriber has already lost his handset (& his valuable information). Thus it doesn't seem reasonable to charge the already distressed subscriber.

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?

- It should be like the UK. Re-programming should be a criminal offence.

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

- HPLMN's EIR--->CEIR---->All EIR

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?

- It should be chargeable. It will curb cases of mishandling handset which are being declared as stolen.

Sincerely yours,

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