

**RESPONSE TO THE TRAI CONSULTATION PAPER NO.14/2010
ON
“ISSUES RELATING TO BLOCKING OF IMEI FOR LOST / STOLEN MOBILE HANDSETS”**

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

Answer: Definitely, blocking of IMEI will make the handset unusable thus discouraging mobile theft. However, effectiveness of solution depends on formulation and implementation of proper legislation on IMEI implant which can be done only by way of active cooperation between Mobile Operators, Government of India & Law Enforcement Agencies

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

Answer: EIR provisioning has been made by us to block calls from mobile handsets without IMEI , invalid IMEI or handsets having IMEI with all zeros. EIR database with “IMEI white list” is upgraded every day with the data provided by GSMA. To achieve the objective the Central Equipment Identity Register system needs to be implemented and all the operators needs to be directed to share their individual black lists to deny the service across the network of all the service providers. However, definitely there will be increase in the load on network and the extent of load is dependent on the number of requests received for blocking of IMEI.

Question 3: In your opinion who should maintain the CEIR? Please give Reasons

Answer: We strongly feel that CEIR system should be maintained by Government of India because establishment and maintenance of database is a crucial exercise. Further with the efforts of the Government of India, Indian telecom operators can also become members of CEIR which means that once a customer has reported their phone as stolen or lost to their network operator, the phone would be blocked from being used across the Globe

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

Answer: CEIR should be maintained at the national level. Current statistics state that about 10 % of current IMEIs in use today are not unique or have been reprogrammed i.e. incase 10% of mobiles are expected to be stolen the estimated data size would be in the range of 100 mn.

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

Answer: Implementation of given scheme depends on number of steps like:-

- ✓ Preparation of database of all the available IMEI's,
- ✓ Regular updation of database in the EIR,
- ✓ Creation of CEIR and its regular updation,
- ✓ Participation by service providers, etc

All this involves cost and constant monitoring. Government of India should provide CAPEX and OPEX involved. In public interest and national security project related to CEIR can be funded by Government of India.

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

Answer: No, service for blocking of IMEI / ESN should be free for customers.

Question 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?

Answer: Many countries have acknowledged the use of the IMEI in reducing the effect of mobile phone theft. There are several Acts being practiced in other countries which widen the categories of persons who can be proceeded against under the Mobile Telephones Re-programming legislations. These Acts are created to counter the number of criminal offences relating to the electronic identifiers of mobile wireless communications devices. For example, In the UK, a law (Mobile Phones Reprogramming Act 2002) has been made to curb the reprogramming of handsets. Reprogramming would make possible re-use while making it difficult to identify any theft of the handset or possessing equipment that can change IMEI. In Latvia, such an action is also considered a criminal offence.

Apart from UK and Latvia which has already addressed this issue by making re-programming of mobile handset as an offence, some other countries like France, Germany, Greece, Spain etc., are actively considering solutions in partnership with the Police authorities on this issue.

In India too, we strongly believe that there should be a proper legislation to prevent reprogramming of mobile devices and in legislation reprogramming of mobile handsets to be treated as Criminal offence thus leading to imprisonment and levy of penalties.

Question 8: What should be the procedure for blocking the IMEI?

Answer: When mobile handset is stolen or lost the owner himself can request their service provider with a request for blocking of IMEI. The service provider through its Equipment Identity Register (EIR) system can block the IMEI on his network and communicate Central Equipment Identity Register (CEIR) which further requests all other telecom service providers to blacklists the IMEI in their network

Question 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?

Answer: Yes, facility for unblocking of IMEI should be provided to the customer. The customer may elect unblocking the handset in the event the phone is found or recovered. Customer needs to contact the service provider and request that the handset be unblocked. After due verification of customer credentials mobile service provider should be provided with a window of 48 hours for unblocking of IMEI in his network and for making request to CEIR which further requests all other telecom service providers for unblocking the IMEI in the next 48 hours.

No, the unblocking of IMEI should not be chargeable to customer.