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From

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To

The Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan
Jawaharlal Nehru Marg (Old Minto Road)
New Delhi – 110002.

Sub.: Submission of comments on Consultation Paper No.14/2010.

Sirs,

I would like to place my point wise comments as furnished below on the Consultation Paper (No.14/2010) on Issues relating to blocking of IMEI for lost /stolen mobile handsets (dt: 2nd November, 2010) before the Telecom Regulatory Authority of India for kind consideration and implementation in public interest.

Yours faithfully,

(S.T.Balamurugan)

Comments Consultation Paper No. 14 /2010 on Issues relating to blocking of IMEI for lost /stolen mobile handsets (dated : 2nd November, 2010)

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

Yes. The primary reason for theft of a mobile is that a new sim card could be inserted in the hand set after easily removing the existing sim card and the hand set is ready to use for the new user. If the hand set is blocked by using IMEI, it will discourage the mobile theft to a large extent.

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

It is obligatory on the part of the mobile operator to maintain the required registers so as to ensure that any scientific development is not misused.

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

A central government agency may maintain the CEIR. The network may be shared by the operators and investigating agencies. Hence any misuse of the technology may be prevented immediately by the investigating agencies.

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

CEIR may be maintained at national level as the stolen mobile could be used in other zones. The network may be shared by the operators and investigating agencies of central and state governments.

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

The central government has to fund the maintenance of CEIR in the interest of security of the nation.

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

No. It will be unfair to charge a person when he/she has already lost his/her mobile set and valuable data.

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?

A legislation is necessary to prevent reprogramming of mobile sets as reprogramming makes the hand set usable to the new user even after blocking of the hand set. Hence anybody involving directly or indirectly with tampering of the unique IMEI of mobile set or reprogramming of IMEI shall be punished to the maximum extent possible.

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

The mobile operator may block a hand set after receipt of written request from the customer alongwith the following proofs.

i) A document confirming one's property right with regard to the mobile handset (together with an IMEI number), an agreement for the provision of telecommunication services or a sales contract or a contract of donation together with an original proof of ownership (an invoice, a receipt).

ii) A document confirming the applicant's identity.

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?

A. Yes.

B. The mobile operator may unblock a hand set after receipt of written request from the customer alongwith the following proofs.

- i) The details of his/her application for blocking of the hand set.
- ii) A document confirming one's property right with regard to a blocked mobile handset (together with an IMEI number), an agreement for the provision of telecommunication services or a sales contract or a contract of donation together with an original proof of ownership (an invoice, a receipt).
- iii) A document confirming the applicant's identity.

C. Unblocking of mobile IMEI number may be done immediately in the order of request from the customers. Yes. Unblocking of mobile set may be charged from the customer on reasonable charges.