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CCS/008/12-13

December 13, 2012

Bangalore

**Shri Raj Pal,
Advisor (ER),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi 110002**

Dear Sir,

Subject: TRAI Consultation Paper No. 16/2012- TRAI on Deactivation of SIMs due to Non-usage dated - New Delhi, 30.11.2012

Here are our comments on the above CP

Q1: What period of continuous non-usage of a SIM should be kept as criteria for deactivation by the telecom service provider?

Answer: We recommend (ii) 90 days as this is reasonable; soon after expiry of this period, TSP must send by a Registered post A/D a notice to the subscriber stating clearly TSP's intention to withdraw the customers SIM number within say 30 days unless TSP hears from the subscriber requesting the TSP to retain the SIM number with a satisfactory reason there for. To retain the No. Beyond 90 days suitable charges can be levied

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?

Answer: Successful completion of any of the listed type of usage. Completion meaning two way communications. We do not know if some programmable automatic dialers may be already in the market which can simulate such usage.

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

Answer: A registered post A/D letter and also through e mail (if available) seems to be best.

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?

Answer: To all subscribers

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?

Answer: Desirable to have this as an optional feature for those who need this and at a cost which can be what it actually costs to “parking costs for a telephone number”

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?

Answer: As the subscriber is already dormant, it is unlikely if he would be interested to receive the balance standing in his credit after 90 days. Hence TRAI can ask this balance amount to be transferred to the already existing Telecom consumer education fund.

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?

Answer: It would be desirable to have this option. We do not have any idea of under what conditions this can be implemented. It can be three months and six months with prior intimation

Regards

*Ravindra Nath Guru
Secretary, CCS, Bangalore*