



30<sup>th</sup> November 2010

Mr. Sudhir Gupta  
Advisor (MN)  
Telecom Regulatory Authority of India,  
Mahangar Doorsanchar Bhawan,  
Jawaharlal Nehru Marg (Old Minto Road),  
New Delhi – 110 002

**Subject: Consultation Paper on Issues Relating to Blocking of IMEI for Lost/Stolen Mobile Handsets dated 2<sup>nd</sup> November 2010**

Dear Sir,

With reference to your consultation paper on "Issues Relating to Blocking of IMEI for Lost/Stolen Mobile Handsets dated 2<sup>nd</sup> November 2010", please find attached herewith comments/views of Tata Teleservices Limited.

In case you require any further information /clarification, please free to contact us.

Thanking you,

Yours sincerely,

Anand Dalal,  
Vice President – Corporate Regulatory Affairs  
Tata Teleservices Limited  
and  
Authorized Signatory  
Tata Teleservices (Maharashtra) Limited

Enclosures: As above.

**TATA TELESERVICES LIMITED**

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**Response to TRAI Consultation Paper on Issues Relating to Blocking of IMEI for Lost/Stolen Mobile Handsets dated 2<sup>nd</sup> November 2010**

- Q1. In order to reduce/discourage mobile theft do you think the blocking of IMEI is an effective solution? Please give reasons.
- A1. Yes. Mobile devices are becoming advanced microcomputer year on year. It contains lot of personal data which can be misused, if it lands in unscrupulous hands. This needs to be supported by making IMEI change by an unauthorized agency as an offence. With blacklisting and subsequent blocking in place, the device becomes practically unusable to any user that uses the handset. The IMEI number is not supposed to be easy to change, making the CEIR blacklisting and blocking effective. However, this is not always the case as IMEI may be easily changed with special tools. New IMEIs can be programmed into stolen handsets. The effectiveness of any solution will depend upon a combination of a technical solution, active cooperation and the partnership of the local police/law enforcement agencies, and an effective campaign to educate the public/mobile handset users.
- Q2. In case blocking of IMEI is implemented, to what extent load on the network will increase? Please give details.
- A2. Currently, all Service Providers have implemented EIR and validating the invalid IMEIs in their network. From signaling network and MSC point of view, there is no additional load in the network. However, database of EIR need to be enhanced with sufficient database sizing. The cost and time lines need to be assessed. If the blocking request comes from handset with tampered IMEI, then original handset will be blocked. This may lead to customer complaints. Therefore, each operator would need to staff sufficiently to handle extra complaints. To handle such situation, there is a need to have regulation to ensure that no one is allowed to modify the IMEIs.
- Q3. In your opinion who should maintain the CEIR? Please give reasons.



- A3. TTL is of the view that similar to MNP clearing houses, CEIR should be maintained by third party or regulator like NIC and it should be accessible by all operators. A major effort is required to build up such a database, and co-operation of all concerned would be crucial for its effectiveness. However, the establishment and maintenance of the database is crucial to the exercise, and countries whose networks operators have not already joined the CEIR should lobby their networks to do so as soon as possible. This would mean that once a customer has reported their phone as stolen or lost to their network operator, the phone would be blocked from use across the Globe. This would significantly reduce the incentive for stealing mobile phones and stop the problem simply being displaced from one country to another. Also, to the extent that the database is available, police authorities could also use it for their purposes.
- Q4. Should the CEIR be maintained at national level or zonal level? Provide details including the estimated data size.
- A4. TTL recommends that CEIR should be maintained at national level for easy integration and propagation of stolen IMEIs to operator's EIRs. Similar to MNP, the CEIR service can be given to 1 or 2 agencies. There is no need of indicating any territory for each CEIR service provider. They need to maintain the record of requests and broadcast them to all operators. Connectivity can be provided either LL or VPN over Internet for CEIR and operator's network. The database sizing should be equal to total subscriber base of mobiles i.e. 700 Mil + 20 Mil per month additions for next 5 years
- Q5. Please comment on cost and funding aspects of Centralized EIR? Please provide detailed cost estimates?
- A5. Since there are no real-time transactions in the system, Cost of CEIR set-up and maintenance may not very high. For implementing the given scheme, a number of steps namely preparation of database of all the available IMEI's, regular updation of database in the EIR, creation of CEIR and its regular updation will be involved. This will involve participation by all the service providers operating in the country. Moreover, a Central Equipment identified Register (CEIR) will need to be created and regularly updated. All this will involve certain cost and constant monitoring.
- Q6. Should blocking of IMEI /ESN be chargeable from customer? If yes, what should be the charge?

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- A6. Similar to MNP, it should be charged to customer for nominal amount. The same amount should be paid to CEIR operators. Currently, ESN blocking is not supported in CDMA technology. Hence CDMA should be excluded in this scope.
- Q7. 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?
- A7. IMEI is manufacturer's identity for the GSM Handset. It should not be allowed to re-program it. With CEIR, IMEI becomes key parameter to allow/deny the service to the customer. Genuine users will lose their service in case IMEI blocking request comes from tampered handset user. Hence, Govt. should bring the legislation to prevent reprogramming of the mobile devices. Unauthorized change of IMEI of handset should be made a punishable offence. 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. These Acts are created to counter the number of criminal offences relating to the electronic identifiers of mobile wireless communications devices.
- Q8. What should be the procedure for blocking the IMEI?
- A8. TTL recommends the following procedures:-
- Customer should register FIR in the nearest police station.
  - Approach Operator's public office and submit the FIR copy with handset details. Each operator should validate the IMEI of the subscriber with FIR copy.
  - Operator should verify the IMEI from IT systems and validate the correctness of the complaint.
  - Register it CEIR through GUI of CEIR or through IT system.
  - CEIR should propagate this information to all operators to update their EIR.
  - As part of network configuration (similar to Null and invalid IMEIs), this handset should be denied access to the network.
- Q9. 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?

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- A9. Yes. The customer should approach parent operator and submit the request for unblocking. The process may be similar to IMEI blocking request. We feel that there should not be any time limit unblocking the IMEI. No, it should not be chargeable. As one time charge is paid during theft registration, there is no need to charge customer again. The customer may elect unblocking the handset in the event the phone is found or recovered. If the reported lost or stolen handset has been recovered the customer will need to contact the service provider and request the handset be unblocked. As the customer is required to confirm certain information relating to the handset usage, call records as a means of verifying the customer and the handset IMEI can be used. The unblocking will occur within a maximum of 24 hours. This is subject to customer verification procedures used when the handset was originally blocked. The same person who requested the block must also request for the unblocking.

A handwritten signature in blue ink, appearing to be 'AK' with a flourish.

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