

Advisor (F&EA), TRAI

Regarding: Consultation Paper on Deactivation of SIMs due to Non-usage

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

- (i) 60 days
- (ii) 90 days
- (iii) 120 days
- (iv) 150 days
- (v) 180 days
- (vi) Any other

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Suggestion:

Since, this consultation paper is the outcome of the complaints by huge number of consumers, if you look at the complaints then you will find that majority of the complainants are

a). either NRI or

b). elderly people living in India whose children's are living away

Before deciding the SIM deactivation period, first you have to see the pattern of SIM usage.

Why NRI require Indian SIM?

1). To receive notifications from Bank accounts held in India like One time passwords for doing online transactions, Alerts related to credit and debt transactions in order to have a check on fraud etc.

2). Today all bank accounts require one mobile number as an Identity of the customer and without which even it is not possible to do online money transfer.

3). On Coming back to India, Immediately NRI's want to contact some relative or call a Taxi even if they are in process of Immigration clearance.

Like Govt. of India's recent Initiative of linking LPG / GAS cylinder to Adhaar number, i suggest to link all Mobile numbers based on Adhaar / Passport Number. Once this link is established then make first mobile number lifetime valid whereas second, third or fourth you can sell at higher prices and put deactivation limit to those number only.

This will really help not only in maintaining mobile numbers but also mobile operators will also get benefit of increased revenues on issuing second third and fourth mobile numbers.

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?

- (i) Outgoing voice call
- (ii) Incoming voice call
- (iii) Outgoing video call
- (iv) Incoming video call
- (v) Outgoing SMS
- (vi) Incoming SMS
- (vii) Data transfer
- (viii) Activation of a voucher
- (ix) Switching the connection 'ON' by powering on the handset and SIM
- (x) Any other

Suggestion:

From (i) to (viii) should be included in the scope of deactivation.

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

Suggestion:

At present operators (vodafone) says that they sent an SMS to customer 24 hours prior to deactivation. If you see all the complaints by consumers over public forums, you will find that none of the complainant received SMS from telecom operator.

Telecom Operators are always greedy and in order to forfeit the balance money they rushed to disconnect the numbers and sold those numbers again to somebody else in order to increase revenue.

Hence, Instead of sending an SMS just 24 hours prior to deactivation, there should be minimum five warning SMS at following interval so that if customer really wants his/her number he/she will definitely take action:

- 1) One month before deactivation.
- 2) 15 days before deactivation.
- 3) 7 days before deactivation.
- 4). 72 hours before deactivation.
- 5). 24 hours before deactivation.

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?

Suggestion:

NO.

All telecom operators violated the agreement of lifetime validity and even TRAI is just sitting idle as soon as i will land India, i am going to file a case against both TRAI as well as Vodafone. whole of my banking activity got stopped because of TRAI and Vodafone.

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?

Suggestion:

Looks like this is just to give benefits to Telecom operators. I know Airtel is offering "Number Locker" facility but why? As an Indian even i cannot own one mobile number for a lifetime?

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?

Suggestion:

The money remaining on a pre-paid SIM card belongs to customer and for which customer has already paid all TAXES. That money has to be paid back to customer in full.

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?

Suggestion:

Minimum 60 days and without any documentation. (Save paper save environment). and within this period Telecom operator should not allow to sell this number to someone else.