

Subject: Comments for Consultation paper Deactivation of SIMs due to Non-usage
Dear Sir,

Please find below comments for the consultation paper on Deactivation of SIMs due to Non-usage

Regards,
Manu Sood

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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

[Q1 Ans]: The operators may want to re-use dormant numbers as quickly as possible while subscribers want to retain for as many

days as possible. A duration of 90 days seems sufficient to allow deactivation. Also see Q3 for intimating the subscriber about

pending deactivation and chance to reactivate.

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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

[Q2 Ans]: An activity which causes revenue earning for the operator should be considered as scope of activity to "reset the

clock of deactivation". For this purpose, following are recommended:

- (i) Outgoing voice call
- (ii) Incoming voice call while roaming hence deduction of charges
- (iii) Outgoing SMS
- (iv) Data transfer hence deduction of charges

Apart from these, an activity which provides money to operator should also be included

- (i) Recharge of minimum Rs.100
- (ii) Activation of a voucher indicating future revenue to operator
- (iii) Payment of monthly bill

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

manner?

[Q3 Ans]: The subscriber should be intimated few days before deactivation so that genuine users or those who wish to retain

their number can fulfill the criteria for activation. For this purpose, SMS alert 15 days prior and automated/voice call 5 days

prior along with information about how to keep the number as active should be provided.

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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?

[Q4 Ans]: It should apply as per terms at the time of enrolment. ALready, such contracts are one sided as the subscriber has no

way to disagree to certain terms and conditions. Allowing operators to change such terms and conditions midway would be a bad

precedence.

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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?

[Q5 Ans]: Yes, it is definitely desired particularly by subscribers who move to different city or abroad for various

personal/professional reasons but will return in near future and desire to retain their numbers.

For Prepaid: Since as part of Question2 a recharge is already proposed to act as criteria of activation, same criteria is

proposed with no other charges. The recharge money is available with operator as safekeeping for future revenue.

For postpaid subscribers: a nominal charge of Rs 50/- per 180 days may be used. In this duration, monthly charges of postpaid

subscriber should not be made to the subscriber.

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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?

[Q6 Ans]: As has been provided in this consultation paper, the average amount remaining in the account is below ten rupees on

average. Hence it will be a big logistical exercise for operator to refund such small amount. At the same time, they should not

be unduly enriched for money which belongs to the user. Also, as per Q3, it is already proposed that users be intimated

beforehand about impending deactivation of their account. Hence the user gets opportunity to use that amount and reset the clock

of deactivation. It is proposed that reimbursement should be made only if the amount is more than Rs 50/- else it should be

transferred by the provider to the TCEPF or any other govt mandated agency like PM relief fund etc.

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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?

[Q7 Ans]: Once a number is deactivated, the operator would want to reuse that number as soon as possible for new subscribers.

However, also linked to this issue is the fact that if the duration of re-use is kept very less, many times people start

receiving calls meant for the previous owners of the numbers. This leads to unnecessary harassment of new subscriber and

previous owner may have communicated their number to any forums leading to unwanted and harassing calls being received by new

owners of the numbers. Hence sufficiently large cooling off duration should be put before a number is re-used. Thus, recommended

duration is 180 days at least. During this time, the original subscriber may want to re-activate their number. A one time charge

(17/- equal to porting fees being levied) may be used by subscriber to reactivate their old number. For security purposes, the

subscriber may be required to follow same process (ID Proof etc) as if applying for new connection. Since for the purpose of re

-entering that subscriber to their system, there would not be any extra effort as compared to allowing a subscriber to port in their

network, hence same fees is proposed.