

Videocon Response to TRAI Consultation paper on Deactivation of SIMs due to Non-usage dated 30th November, 2012

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

We would like to submit that 90 days of continuous non-usage of a SIM should be kept as criteria for the deactivation of services by a service provider.

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

We suggest that the outgoing Voice calls and outgoing SMS should be considered in the scope of activity with regard to the criteria for deactivation of SIM's upon non-usage.

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

We are of the view that customers get this information through various modes, namely SUK at the time of enrollment, website of the service provider and TRAI, Call Centre and even public notice advertisement so that they are fully aware and informed about the deactivation criteria.

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?

Dear Sir, we would like to submit that due to tremendous growth of telecommunication services in India, Mobile Number Series has become scarce in nature, in view of this we would like to suggest that service providers should be allowed to revise the Terms and Conditions by adequately informing their complete customers apart from any categorization of the customer. This should be allowed so that business continuity is maintained and there are no impediments to the growth of mobile services.

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?

Yes, a safe custody process should be provided to the customers who wish to retain their number for a longer period which is getting into a non usage cycle and can do by paying nominal charges for the same and reactivate the same number at the later date of his choice.

However, we believe that the safe custody scheme should be left to the market forces and should not be regulated.

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?

We are of the view that refund of monetary value should be left to the market forces.

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?

We believe that the period of reactivation of the SIM should be left to the market forces and should not be regulated.