

LM/TRAI -03
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Mahanagar Door Sanchar Bhawan
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Sub. : TRAI Consultation Paper on "Deactivation of SIMs due to Non-usage".

Dear Sir,

This is with reference to Consultation Paper on "**Deactivation of SIMs due to Non-usage**" issued by TRAI on **November 30, 2012**, seeking for comments from the stakeholders on the issues involved.

In this connection, please find our comments/suggestions on the various issues related to deactivation of SIMs due to Non-usage are as given below:

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

At the outset, we would like to draw your attention to the fact that most of the population based in Mumbai metro service areas are of floating in nature & the permanent stay is not continued as most of them are from the other states or keep moving for their business purpose and keep going back to their native place/business destinations for longer periods ranging from 1 months to 6 months at a time. This segment may not use National Roaming Services outside home service area as the same is more expensive than that in the home service area. A similar behavior is observed when the subscriber travel outside india. As a result, a sizeable number of SIMs remains not-in-use for long period of time. However, the probability of re-use of such SIMs is generally quite high.

So a 180 day period would be adequate for such a segment to return to Home Service area and once again start uninterrupted usage.

Moreover the chances of a subscriber coming back with a request for re-activation after a non-usage period of as long as 180 days are negligible; even if the subscriber has been away from home service area for various reasons.

In view of above, we support that a period of 180 days of non-usage should be considered for deactivation of a SIM. A period of 6 months is long enough for a subscriber to start re-using his SIM in inactive/dormant state.

Moreover this time frame is generally the criteria for retaining the Life Time validity benefit for a subscriber & is a well known accepted criteria.

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

The following should be included in the scope:

- ✓ Outgoing voice / video call
- ✓ Incoming voice / video call
- ✓ Outgoing SMS.
- ✓ Data Usage
- ✓ Recharge

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

The subscriber should be informed about the criteria of SIM deactivation by following means:

- Mention on SUK
- Mention on CAF
- Communication on Website

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?

The criteria for de-activation due to non-usage should apply to all subscribers irrespective of the condition of non-usage being a part of contract at the time of subscriber's enrolment.

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?

The chances of a subscriber coming back with a request for retention after a non-usage period of as long as 180 days are negligible; even if the subscriber has been away from home service area for various reasons. Normally there should not be a requirement for such a retention scheme. However in case the subscriber wants to block the mobile number, a "number validity fee" could be worked out basis variable periods.

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?

The monetary value remaining on a pre-paid SIM should be forfeited.

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?


A period of 180 days is enough for a subscriber to decide whether he would want to continue with the same or not. A facility to reactivate such a number would further delay the re-use of mobile number resources on the part of TSP.

This is for your kind consideration, please.

Thanking you,

Yours faithfully,

For **Loop Mobile (India) Limited**


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