



Comments by WiExp Limited on

TRAI consultation paper on issues relating to blocking of IMEI for lost/stolen mobile handsets

Oxford, UK: 8th November, 2010

1. In order to reduce/discourage mobile theft do you think the blocking of IMEI is an effective solution? Please give reasons

Yes it is an effective solution as long as,

- (a) The handset has not been reprogrammed after being stolen.
- (b) The Operator keeps a record of IMEI number for duration long enough to be notified by the subscriber after the handset is stolen.

Or

The subscriber keeps a record of IMEI number.

2. In case blocking of IMEI is implemented, to what extent load on the network will increase? Please give details

If CEIR is implemented then there would be heavy signalling load as the Operator's switch will query an external database each time. But in a much simpler solution CEIR is not needed and the Operator's EIR can update each other once in 24 hours through the existing SS7 Inter-Operator signalling network. This update can be performed in couple of minutes at off-peak time. The stolen handset can be recorded in Operator's EIR black list manually which will perform the IMEI check during location update without causing a significant load on network. It would be much easier to use internal signalling all day and external signalling for few minutes, than using an external signalling all day. CEIR should also be avoided to prevent single point of fraud by 3rd party, as the individual EIRs are better protected by Operators.

3. In your opinion who should maintain the CEIR? Please give reasons

Due to high number of Circles and Operators in India, the implementation of CEIR will increase heavy signalling load between the Operator's individual EIR and the CEIR. The MSC/MSS will have to query external CEIR each time instead of checking it internally.

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Therefore instead of having a CEIR, the EIR check should be switched 'ON' and this would just add to one more signalling between MS and switch without causing any noticeable network load.

The EIR should update each other over Inter-Operator SS7 links during off-peak time. This would divert the network load from 24 hours to few minutes.

4. Should the CEIR be maintained at national level or zonal level? Provide details including the estimated data size

As mentioned above EIR update once in a day would be a better solution than having a CEIR.

5. Please comment on cost and funding aspects of Centralized EIR ?Please provide detailed cost estimates?

No extra cost is required and EIR can update each other automatically.

6. Should blocking of IMEI /ESN be chargeable from customer? If yes,what should be the charge?

No, this shouldn't be considered as a facility rather the use of technology to protect crime.

Instead, the following parties should provide any fund required to compensate the extra work by Operator's team or Law Enforcement Agencies:

- (a) Handset manufacturers who would obviously be benefiting from sale of new handset instead of cycling of stolen ones.
- (b) Insurance companies who otherwise have to pay full handset amount.

7. 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?

Reprogramming of mobile devices by individuals should be considered a crime as it not only encourages the theft of handset but also impacts LI, where the IMEI is used to track crimes and criminals.

8. What should be the procedure for blocking the IMEI?

- (a) The subscriber files an FIR with police.

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- (b) The subscriber visits the Operator's CCC with police report and proof of identity.
- (c) The Operator enters the handset in its EIR's black list and all other Operator's EIR records it within 24 hours during EIR update.
- (d) Any attempt to use the stolen handset will be blocked during MS-MSS/MSC signaling.
- (e) Further the Operator can also know the new user by checking the MSISDN being used by the blocked IMEI.

9. 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?

- (a) The recovered handset must be sent to police station and the subscriber should be informed.
- (b) The subscriber gets the handset from police station by showing the FIR and identity proof.
- (c) The police put a NOC stamp on the FIR report.
- (d) Subscriber visits the Operator's CCC and presents the NOC to unblock the IMEI from black list.

The Operator should be given 48 hours to unblock the IMEI, i.e. remove it from the black list so that the subscriber is able to use it again.

This process should not be charged as the subscriber would have already used a lot of time and effort for this 4 step process. Again any financial burden on Operators or Law Enforcement Agencies should be taken care by handset manufactures and insurance companies.