

Citizen consumer and civic Action Group (CAG)

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Comments to 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

Ans.: The period of non-usage of a SIM before deactivation should be 180 days. This is a reasonable period of time, as it would cover an individual's short time of travel for work, vacation, etc. A shorter period of time than 180 days would make it very inconvenient for frequent travellers. They would have to face the hassle of deactivation and changing SIM cards time and over again and thus, in a way, lose their identity.

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

Ans.: Other than point 9, all of the above should be included in the scope of activity

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

Ans.: The start up kit and the customer acquisition form can carry the required information. Other than that, before deactivation, the service providers should inform the customers either by emailing them to the email ids provided by them or in the absence of email access, by calling them or messaging (to be confirmed by the consumer) them on the alternative number provided by consumers if the numbers in question are not reachable. If nothing works, a communication in hard copy needs to be sent. In one way or the other, it is important that the consumer is informed before deactivation. [Later, if

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the customer complains, the service provider should be able to produce sufficient evidence to prove.]

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?

Ans.: Uniformity in the regulations would be much easier to comprehend. Points mentioned in Ans.3, would apply to this question as well.

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?

Ans.: Yes, there should be a retention scheme that a person can activate before the long period (beyond the 180 days) of non-usage. The terms should include the actual costs involved and the details of the consequence once it expired. The consumer should be required to give the exact duration of the extension period.

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?

Ans.: If all points mentioned under Q3 and Q5 are followed, then, the monetary value might 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?

Ans.: A reactivation period of one month could be allowed.