



## **MTS response to “TRAI Consultation Paper on Deactivation of the SIM’s due to the non-usage”**

At the outset, we welcome the opportunity given to comment on the issues raised in consultation paper on Deactivation of the SIM’s due to the non-usage.

The adequate availability of numbering resource is threatened because of increase in massive growth in number of connections especially in mobile segment. In order to deal with the issue of making available the numbering resource, DoT has revised the eligibility criteria for applying additional number series i.e. from HLR subscriber base criteria to the VLR subscriber base criteria.

The increase in competition, low tariffs and minimal cost in purchasing a new connection has resulted in keeping multiple connections by the customers and not using all of them without realizing the fact that the numbering resource is unnecessary getting blocked. Further, service providers are not allowed to report these numbers as part of the request for applying additional number series as these are not registered on VLR.

In view of the foregoing, our issue wise submission is as herein 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**

We wish to submit that at least 180 days of continuous non-usage of a SIM should be kept as criteria for deactivation by the telecom 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 an outgoing voice call, outgoing SMS, VAS usage, Data usage or activation of a voucher 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 any of the following method should be used for communicating the criteria of deactivation of SIMs to the subscriber in a transparent manner:

- SUK
- CAF
- Web site

**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?**

We would like to submit that the condition of deactivation due to non-usage should apply in all cases by appropriately informing the customers in order to ensure the objective of efficient use of numbering resource by the service providers.

**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?**

We suggest that a safe custody process should be provided to the customer wherein any customer desirous of retaining his / her number for a longer period and is getting into a zero usage cycle can do so by paying the prescribed charges for the same. Further, the terms, conditions and charges should be left to the market forces.

**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 wish to submit that the decision on forfeiture of any balance lying on the customers account should be the prerogative of service provider since there are complexities involved in processing the refund to the customers and in some cases where the balance amount is low the cost of refund is more than the actual amount to be refunded. In view of the same we propose that an open policy where the balance is more than Rs. 100 may be followed for processing the refund to the customers.

**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 are of the view that our current proposal of at least 180 days of continuous non-usage of a SIM should be kept as criteria for deactivation by the telecom service provider gives customer enough scope to recharge or use his account, so any further grace period is not required to be specified post 180 days of no activity period.