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February 01, 2021

Shri Anshu Prakash
Chairman DCC & Secretary(T)
Digital Communications Commission
Department of Telecommunications
Ministry of Communication
Sanchar Bhawan, 20, Ashoka Road,
New Delhi – 110001

Subject: Request for a meeting to discuss the industry concern of Duplicate IMEI numbers

Respected Sir,

Greetings from MAIT!

The Department of Telecommunication is performing a leadership role in the technological progress of the country, through the telecom infrastructure. The timely and prudent policies are making a positive impact, not only for the Telecommunication sector but also enabling other sectors to leverage the emerging benefits from them.

MAIT is the industry apex body, representing the Electronic Hardware sector in the country. MAIT also represents major Information Technology, Data Communication, Networking products, and Technology companies. Our members comprise both the MNCs and the Indian firms including MSMEs. MAIT has a 3 pillar strategy, focusing on Manufacturing, Ease of Doing Business, and Demand Generation.

Today, a critical part and the heart of the Telecom infrastructure are Information Technology, Data Communication, and Networking technology-based products. Thus, over the last few years, the collaboration of MAIT with DOT has been steadily increasing.

We wish to draw your attention to the matter of duplicate IMEI numbers on a single smartphone device. Every smartphone device carries a unique 15 digit number known as International Mobile Equipment Identity (IMEI) number where no two devices can have the same numbers. The IMEI number allows mobile service providers to identify the smartphone devices on their network and track a phone when it is lost or stolen. Cloning an IMEI number means, the identity of the smartphone device is lost in the volume of the same numbers.

As per the industry, this issue is not occurring due to any manufacturing problem as all the Smartphone devices shipping out from the factory have a unique IMEI number. A smartphone device loses its original IMEI number when it is exposed to unauthorized tools like flashing, rooting, or software access, etc., by any unauthorized service personnel due to which the system relapses to the default setting of IMEI from the backend memory.

For current and upcoming models, brands have strengthened their Anti-Root Mechanism to prevent the resetting of IMEI numbers such that any unauthorized access or tampering will result in the device reverting into the factory default setting of 0000. However, for older smartphone devices that do not have a strong enough anti-root mechanism, consumers will need to submit

their smartphones to the respective brand's authorized service centre to recalibrate the anti-root mechanism.

Hence, DOT or a subordinate office will need to create a draft regulation or a policy that enables telecom service providers to block such devices in consultation with the respective Smartphone manufacturers. Given that, the Citizen of the country relies on their smartphones for daily livelihood purposes, MAIT would recommend that such blocking have an upper cap of 500 per day across the country.

Towards the above-said issue, a few smartphone brands have already submitted a proposition to the DOT on how a phased manner migration of rewriting an IMEI number can be attained across the country.

We look forward to your positive consideration and allow us to represent this matter in person for a more comprehensive discussion.

With regards,

A handwritten signature in black ink, appearing to read "George Paul". The signature is fluid and cursive, with a long horizontal stroke at the end.

George Paul
Chief Executive Officer