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Dated 22.06.2011

To:

**Sh. R.K. Upadhyay
CMD, BSNL
New Delhi-110001**

Sub:- Problems in International roaming –reg.

Respected Sir,

We would like to draw your kind attention on the crucial issue that our esteemed, commercially important, CUG, Corporate and international roaming customers are not at all happy about our international roaming service. They started deserting BSNL. Let us check how International roaming (IR) is implemented in BSNL Network and how the problems are being faced by the customers, the details are as under :-

How International roaming (IR) implemented in BSNL:

- BSNL implemented IR through Roaming Replicator, Which allows an operator to “piggyback” onto another network’s existing roaming relationships. Roaming Replicator is a SS7/MAP node with full SCCP capability.
- Inbound Roaming: Roaming Replicator makes the ‘Foreign Network’ thinks that its subscriber is roaming in ‘Partner Network’.
- Outbound Roaming: Roaming Replicator makes the ‘Foreign Network’ thinks that the ‘Partner Network’ subscriber is roaming in its network.

BSNL has been using triple IMSI (IMSI of Spice, IMSI of WB LSA and IMSI of home LSA) SIMs for facilitating international out roaming to BSNL subscribers. International Roaming customers have to follow the following procedure through STK to get roaming service in foreign.

STK (SIM Tool Kit) application for international roaming.

1. After landing into foreign country, switch ON the phone and go to Menu.
2. Click on Cellone or BSNL Mobile and select Network.
3. In the network you will get option of National and International.
4. Select International, you will get CellOne and Partner Network.
5. Select the option Cellone; you will get a message - "CellOne International Selected".
6. Wait for two minutes you will get the Network automatically.
7. If it fails, please select the network manually. (By selecting Setting and then Network in your phone).

Problems with international roaming in piggyback method instead of direct roaming:

- Before leaving to the foreign country, customers have to personally visit our CSCs to change his single IMSI SIM to Triple IMSI SIM.
- Customers have to do the messy exercise of network selection
- **Serious problems of using triple IMSI instead of Single IMSI:** The agreement for 'Roaming Service on revenue sharing arrangement' with M/S Idea Cellular Limited (erstwhile M/S Spice Communications Limited)' was expired on 31-07-2010. At present, only direct bilateral international roaming arrangement exist and West Bengal (INDWB) continues as nodal circle. Hence BSNL customers availing International Roaming Services require only dual IMSI i.e West Bengal LSA like IMSI in addition to IMSI of its home LSA in the SIM. The Spice like IMSI, as available in existing triple IMSI SIMs became in-effective after 31-7-2010. But still our customers are using triple IMSI SIMs hence the international roaming customers getting the Menu => **CELLONE or BSNL MOBILE >>>> International>>>>Partner Network >>>>Spice IMSI (Invalid)**. Most of the time the customer is selecting the invalid partner network IMSI. Hence the customer is not getting International Roaming. Many customer care centers are not aware of this problem. **Our esteemed High ARPU IR customers are very annoyed and slowly porting out to other operators. BSNL CO already issued order vide No 55-14/2008-CMTS (Pt-II) dated 28-07-2010 to procure dual IMSI SIMs But still, the customers are using Triple IMSI SIMs only.**

What our competitors are doing: Our competitors having direct roaming agreement for the international roaming. Hence their customers are very comfortable and feeling like in home, No need to follow any network selection procedure after landing in foreign country. Many of our customer having alternate number with our private competitor hence they are bitterly complaining about why BSNL only creating so many problems in international roaming.

Leading questions to be answered:

- Why BSNL is not having direct roaming agreement for all circle SIM ranges? If the answer is Signing international roaming agreements for all circle SIM ranges is laborious process, How our competitors having such agreements?
- Why still we are using Triple IMSI SIM cards instead of Dual IMSI SIM cards though it is evident that it is creating great confusion among the IR customers from 31.7.2010?
- What is the problem in procuring dual IMSI SIM cards?
- Why it was not done even after one year of order vide No 55-14/2008-CMTS (Pt-II) dated 28-07-2010 to procure dual IMSI SIMs?

It is therefore requested kindly to intervene in the matter and take necessary steps to resolve the above mentioned problems at the earliest in the BSNL interest.

With kind regards,

Yours Sincerely
-sd-
(Prahlaad Rai)
General Secretary

Copy to:

Sh. R.K. Agarwal, Director (CM) BSNL CO, New Delh-110001