



**MNP INTERCONNECTION TELECOM SOLUTIONS INDIA PVT. LTD. (MITS)**

Response to

Consultation Paper No. 6/2024 dated June 24, 2024

on

Issues related to Critical Services in M2M sector and transfer of ownership of  
M2M SIMs

## **BACKGROUND**

MNP Interconnection Telecom Solutions India Pvt. Ltd., hereinafter referred to as “MITS”, was granted a license to provide MNP services in Zone 2 (South and East of India) in March, 2009. MITS has provided flawless service in Zone 2 (South and East region) to the industry in the last 11 years of service. Further, MITS has supported both the Regulator, Telecom Regulatory Authority of India (“TRAI”), and the Licensor, the Department of Telecommunications (“DOT”), at various stages including implementation of Corporate porting, National porting and all the regulation / MNP process amendments from time to time. We have always followed and advocated use of international best practices based on immense experience and expertise of MITS’s & it’s parent, iconectiv LLC which is majority owned by Ericsson, Sweden.

We thank TRAI for formulating a comprehensive Consultation Paper on the “Issues related to Critical Services in M2M sector and transfer of ownership of M2M SIMs.” Undoubtedly, this is of paramount importance for the all the stakeholders. We would like to share our opinion on two of the issues from the said consultation paper.

## **Issues for Consultation & Response from MITS**

**Q4. Whether there is a need for establishing a regulatory framework for the transfer of ownership of M2M SIMs among M2MSPs? If yes -**

- (a) What should be the salient features of such a framework?**
- (b) In which scenarios, the transfer of ownership of M2M SIMs should be permitted?**
- (c) What measures should be taken to avoid any misuse of this facility?**
- (d) What flexibility should be given to the new M2MSP for providing connectivity to the existing customers?**

**Please provide a detailed response with justifications**

**MITS Response:** Yes, setting up a regulatory framework will help in addressing various challenges by facilitating smoother operations within the M2M ecosystems. Listed below are benefits of the proposed regulatory framework:

- **Enabling smooth transactions:** A clear and precise regulatory framework which includes guidelines introduces a neutral party to the M2M ecosystem. This will avoid the adoption of bilateral transfer mechanisms and prevent large service providers acting as the de facto broker by default. Establishing a regulatory ecosystem with a neutral 3<sup>rd</sup> party broker will minimize disruptions to critical services that depend on these SIMs.
- **Compliances and Service Quality:** M2M regulations would further support the critical sectors that leverage such services, including healthcare, smart infrastructure, and the auto industry. MITS recommends that TRAI implement regulations that create a

monitoring and reporting regime to ensure service quality and service uptime to better protect consumers.

Permitting the transfer of M2M SIM ownership in the below listed scenarios supports operational flexibility, ensures continuity of service, and helps align with business and regulatory needs as this sector has tremendous growth potential.

- **Customer requests:** Customers may choose to switch providers because of better pricing, enhanced features, improved services, or contractual reasons
- **Company mergers and transfers:** In event of any business mergers, there would be a need to transfer ownership of M2M SIMs for continued and uninterrupted service. Corporates should also be given an option to transfer the ownership of M2M SIMs from the existing to a new service provider again in a seamless manner without impact to end subscriber.

The current model of MNP services implemented in India can be easily replicated to provide transfer of ownership of the M2M SIMs using a centralized DB solution. This will promote the adoption of a regulatory framework that will encourage healthy competition, protect consumer interests, and maintain operational continuity in the rapidly evolving M2M and IoT sectors.

**Q5. Whether there are any other relevant issues relating to M2M/ IoT services sector which require to be addressed at this stage? Please provide a detailed response with justifications.**

**MIT'S Response:**

**Yes.** M2M and IoT services are rapidly evolving technologies with vast potential; however they also present certain challenges. Below, MIT'S has listed a few of the relevant issues that need immediate attention for the success of the M2M and IoT sector.

1. **Evolution in the sector:** As the M2M sector continues to evolve, regulations must also evolve to promote the development of technology advancements.
2. **Device and Data Management:** Due to a highly fragmented market today with multiple Mobile Network Operators (MNOs), Mobile Virtual Network Operator (MVNOs), and eSIM Vendors, it has become difficult to manage and maintain compliances. There is a need to adopt a central database solution to manage and store information related to these devices. This will avoid data inconsistencies, make management of interconnected devices easier, and strengthen data integrity.
3. **Consistency and Reliability:** To ensure user satisfaction and consumer safety, guidelines and service quality assurances must be enforced across all IoT use cases including smart cities, healthcare, and the auto industry.
4. **Surveillance and Security:** Preventing misuse of IoT devices, data breaches and respecting user privacy are paramount for maintaining trust and compliance with emerging data protection regulations.