TRANSATEL'S RESPONSE TO
TELECOM REGULATORY AUTHORITY OF INDIA

CONSULTATION PAPER ON
THE ISSUES RELATED TO CRITICAL SERVICES IN THE M2M SECTOR,
AND TRANSFER OF OWNERSHIP OF M2M SIMS

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Introduction

[Transatel](#) is a global cellular Internet of Things (**IoT**) connectivity solutions provider and a leading Mobile Virtual Network Operators Enabler (**MVNE**) with over 120 Mobile Virtual Network Operator (**MVNO**) managed on its own full core network. A Pioneer of machine-to-machine (**M2M**) connectivity, Transatel simplifies global IoT deployments through a single integration to its connectivity management platform by leveraging LTE-M, 3G, 4G, and 5G network access agreements with 250+ Mobile Network Operators (**MNO**). Today, Transatel's SIMs and eSIM securely connects millions of vehicles, industrial and consumer devices to public and private cellular networks across the world for clients such as BMW, Airbus, Worldline, Stellantis, and Jaguar Land Rover.

Transatel appreciates the opportunity to submit its response to the Telecommunications Regulatory Authority of India (**TRAI**) on its Consultation Paper on the Issues Related to Critical Services in the M2M Sector, and Transfer of Ownership of M2M SIMs (**Consultation**)

Critical M2M/IoT

Transatel shares the views expressed by others that:

> *Criticality in any sector may be use-case driven and the same may not be made applicable for the entire domain/ sector.*

For example, the Inter-Ministerial Working Group (**IMWG**) identified Connected and Autonomous Cars/ three wheelers and two wheelers (**Connected and Autonomous Cars**) as a Critical M2M/IoT services. However, not all use case for Connected and Autonomous Cars are critical. Use cases withing the wider category of Connected and Autonomous Cars that are not critical include:

- parking assistance provided to car drivers that rely on cameras and ultrasonic sensors to assists the driver in parking a car.
- telematic services provided to automotive vehicle manufactures consisting of both vehicle-centric services such as keyless system, remote monitoring, and over-the-air software updates.
- concierge services provided to automotive vehicle manufactures allowing a car driver to connect to the automobile manufacturer's contact centre for vehicle related services such as roadside assistance.
- infotainment services provided to automobile vehicle manufactures that allow their customers to use applications such as Google maps, Spotify, OTT applications such as WhatsApp if permitted by applicable laws and regulations.

- infotainment services provided to car drivers/passengers consisting of content streaming and internet through in-vehicle Wi-Fi.

This unequivocally demonstrates that a balanced approach is required to improve customer experience, drive innovation and increase affordability for Connected and Autonomous Cars services.

Transatel would like to emphasise that mandating the M2M/IoT services to be provided only using licensed spectrum should not result in Mobile Network Operators (**MNOs**) being the only entities in the M2M/IoT ecosystem that can provide Connected and Autonomous Car services in India. Other entities in the M2M/IoT ecosystem referred to as Mobile Virtual Network Operators (**MVNOs**) such as Transatel that is both an application service provider and M2M service provider, must be able to enter relationships with MNOs (which are actors with licensed spectrum) in India to provide Connected and Autonomous Car services under such MVNO model. Moreover, TRAI should let free to negotiation between the MVNOs and the MNOs the possible MVNO models (reseller, light MVNO, full MVNO) in order to foster innovation and economies of scale. Typically, global MVNOs such as Transatel are operating under the ITU non-geographic Mobile Country Code 901 to precisely generate such economies of scale to the benefit of car manufacturers and end-customers. Limiting the provision of Connected and Autonomous Car services to MNOs (or light MVNOs) only would result in the immense opportunities associated with the services and its technological ubiquity not materializing in India.

Contact Details

Should TRAI require any implementation additional information or clarification on any elements set out in Transatel's views on the Consultation, please do not hesitate to contact:

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