

Views and comments on paper embedded sim by upobhokta sanrakshan kalyan samiti,Kanpur(CAG member)

Q1. Whether the TRAI recommended timeline, about the foreign eUICC fitted devices to be on roaming with Indian TSP's network for a maximum period of three years only, needs a review? If yes, what should be the timeline after which the eUICC should mandatorily be configured with Indian TSP's profile?

The eUICC will not only cater to M2M models but will have a significant impact on the Consumer segment as well. The Consumer solution targets end-users as well as enterprises that use devices targeted to the consumer market. The Consumer solution manages end-user interaction via the mobile device end-user interface, and supports standalone and companion device types.

Q2. Whether there is a need to change the controlling SM-SR from foreign TSP to Indian TSP in case of foreign eUICC fitted devices operating in India? If yes, what should be the methodology and time period within which it should be done?

It has a different backend infrastructure and different roles assigned to architectural entities. The GSMA Remote SIM Provisioning Consumer solution follows a client-driven (pull model) approach and enables control over remote provisioning and local management of operator profiles by the end-user of the device. In addition to the M2M solution framework, a consideration of requirements for end usermanaged devices

Q3. Whether there is a need for the SM-SR of each TSP to be integrated with the SM-DP of each other TSP? If yes, what should be the methodology for integration? Please specify the timelines also.

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Q4. Whether there is a need to prescribe SM-SR swapping among the Indian TSPs? If yes, what should be the modalities and procedure for such swap?

It may be lucrative for Operators 2 & 3 since they do not have to establish their own SM-DP+ servers. However, there may be concerns if Operator-1 takes advantage of its SM-DP+ ownership rights and refuses to switch to Profiles of Operators 2 & 3 even when requested by the end User. Nevertheless, the MoU terms between the Operators will probably take care of these aspects.

