Ref: VNOAI/REG/TRAI-CP/M2M SIM   **Date:13.09.2022**

To
The Advisor (Network, spectrum & Licensing)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
New Delhi- 110 002.

Sub: Consultation Paper No. 55/2022 dated 26.07.2022 on "Embedded SIM for M2M Communications "

Sir,

This is with reference to the above-mentioned consultation Paper dated 25.07.2022. VNOAI is thankful for giving opportunity to stake holders to provide its comments. In this regard on behalf of all the VNOAI members we are submitting pointwise replies in the attached annexure.

The same may be kindly considered.

Best Regards,
For Virtual Network Operators Association of India

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VNOAI's Response to the Paper on "Embedded SIM for M2M Communications "

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?

ANS: It is suggested that in view of advancement of technology we can evaluate how much quantum of devices will be there on roaming we can prescribe the same time lines and make it upto three years the device can roam in the Indian Network subject to security conditions are duly met.

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?**

ANS: It is suggested that SM-SR should move to India along with the profile movement to India and need to follow transfer plan as outlined in GSMA RSP for M2M.We agree and recommend that as soon as Indian TSP's profile is downloaded onto eUICC through foreign SM-SR there should be immediate SM-SR swap as per GSMA RSP.

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.

ANS: Standard integration practise as prescribed in GSMA SGP of M2M and Consumer to be prescribed. The SM-SR integration of all the TSP required to suitably mandated in line with the GSMA SGP.

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?

ANS: Yes there can be an option of either integration of SM-SR with SM-DP or SM-SR can be with EUM (eUICC Manufacturer). As EUM could be common across multiple TSPs SM-SR can be operated by EUM.

Q5. Whether the profile switchover, from one TSP to another, is driven by the user or OEM? If yes, what methods can be deployed to execute such switchover?

ANS: The end-user enters the Activation Code to the e-SIM enabled phone LPA (Local Profile Assistant). Depending on the device capabilities, the LPA shall support entry of the Activation Code by manual typing to select SM-DP+

Q6. Whether non-TSP entities, such as OEMs and M2M Service Providers, should be permitted to own SM-SR and manage the subscribed profiles for their devices? If yes, what should be methodology and procedure?

Ans: SM-DP of TSPs to be allowed to integrate with SM-SR as per standards mentioned in GSMA SGPs so that non-TPS entities can manage their SM-SR.

Q7. Whether the use of ITU allocated shared Mobile Country Code 901.XX (Global IMSI) be permitted in India for M2M Communication? If yes, what should be the methodology and procedure? If not, what are the reasons and challenges in implementation of Global IMSI? Please elaborate.

ANS: Global IMSI can be used for limited use case like that of an initial boot-strap and subsequently profile of Indian operator to be pushed as operation profile and later swap of SM-SR as well. This ensures usage are very limited with Global IMSI and it does not create an issue of any operational challenges of managing number series which is not owned by MNO/VNO, Lawful interception, etc.

Q8. Is there any issue, pertaining to the Consumer eSIM, that needs to be addressed? Please highlight the issue and suggest mechanism to address it with justification.

ANS: No major issues with consumer e-SIM we find right now.

Q9. Give your comments on any related matter that is not covered in this Consultation Paper.

ANS: All relevant topics are covered in this consultation paper