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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

To,

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Sub: Consultation Paper on the Issues Related to Critical Services in the M2M Sector, and Transfer of Ownership of M2M SIMs.

In reference to the captioned subject matter, the comments from BSNL are as below:

Q1. Whether there is a need for a broad guiding framework for defining a service as critical M2M/ IoT service? If yes, what should be the guiding framework? Please provide a detailed response with justifications.

Comments: Ideally when we say connected world, we need to have a good connection across all use-cases. Having an always on connectivity then becomes an imperative.

Hence irrespective of the criticality of the IOT/ M2M service quality of service is a must.
Since the IOT adoption is to increase in the coming years especially from a Industrial Automation and Smart Manufacturing POV we can have a guiding framework which has multiple criteria to judge as critical or not.

- Life Threatening (Smart Medical Devices, Connected Ambulances, Telematics (AIS:140)
- Business Impacting (Smart metering, Connected Vehicles, Car Infotainment)
- Livelihood and Employment (Smart Water, Smart Agriculture, Weather Forecast for Fishermen
- Community Services (Emergency Response, Dial Ambulance, Call a TOW, Smart Cities, Smart Polling, Smart Parking)
- Some criteria with weightage and every M2M/IOT use-case may be assigned to the criteria.

Q2. Through the recommendation No. 5.1(g) of the TRAI's recommendations on 'Spectrum, Roaming and QoS related requirements in Machine-to-Machine (M2M) Communications' dated 05.09.2017, TRAI had recommended that critical services in the M2M sector should be mandated to be provided only by connectivity providers using licensed spectrum. Whether this recommendation requires a review? Specifically, whether critical services in the M2M sector should be permitted to be provided by using unlicensed spectrum as well? Please provide a detailed response with justifications.

Comments:

Yes this needs a review. QoS
by a single operator is not a problem with India only. It is a global issue, hence multiple profiles with switching between profiles based on the connectivity in the area and allowing a user to choose which network he/she wants depending on where the IOT /M2M Service is availed is important. Hence UICC based proprietary technologies (based on 3GPP,ETSI) or eUICC (Based on GSMA) must be implemented. Since India is still at the lower end of IOT/M2M Adoption UICC should be allowed in the country for some more time say 5 years so that by then the complete eco-system is conversant with the technology and the adoption then becomes easier.

Also it becomes mandatory to have these services from a M2MSP operating with licence band so that unbiased choice of network can be opted by user/ use-case.

Q3. Whether there is a need to bring M2M devices under the Trusted Source/ Trusted Product framework? If yes, which of the following devices should be brought under the Trusted Source/ Trusted Product framework:

    (a) All M2M devices to be used in India; or
    (b) All M2M devices to be used for critical IoT/ M2M services in India; or
    (c) Any other (please specify)?

Please provide a detailed response with justifications.

Comments:

All M2M devices to be used in India should be under the Trusted Source framework to bring in standardisation and to allow interoperability with other countries when the particular use-case is to do with Exports etc. This way Indian IOT/M2M use-cases, products, design will have global sale ability.

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 a new M2MSP for providing connectivity to the existing customers?

Please provide a detailed response with justifications.

Comments:

    (a) Depending on the use-case the features might vary. At a minimum to kick start this important
        aspect for M2M we need to ensure that any point of time the M2M SIMS is assigned to the right custodian. In Automotive use-case for transfer is perhaps the current owner is selling the vehicle to a new owner.   The AIS: 140 Backend and Vahan Portals must ensure that the KYC of the new owner is associated with the vehicle and the old owners data is maintained but not m

apped to the SIM. As many times there is a resale the SIM must be associated with the current owner   via KYC process.

If it is a corporate purchase for e.g. XYZ buying SIMS for their sound boxes, if the sound boxes are owned by XYZ then single KYC in name of XYZ and if they sell it then a new KYC in the name of the purchaser of the sound box must be done.

KYC is the simplest tool / framework for transfer of SIMS.

In Case a company shuts down or SIMS have to be transferred for business purposes re-

KYC and Authorisation Letter should be the process – which the telco or M2MSP has to maintain in their records.

In compliance to DoT alternate digital KYC, need to initiate OTP verification on mobile application for both A-party and B-party i.e. A-party the organisation transferring the inventory and B-party the organization taking the ownership

(b)

- Change in ownership – B2C or B2B2C – Selling bundled SIM with device cases
- Business Owner Changes
- Companies shutting down for continuity of service

(c)

- Supporting Letter as proof for reason of transfer if furnished then the case is a genuine
- Limited time for KYC and documentation

(d)

- Same pricing flexibility from licensed operators to the new M2MSP
- APIs to reflect the change in M2M SP in all government portals and TSP systems

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.

Comments:

As the consultancy subjects KYC it have been identified that the triplet Device, machine and Custodian KYC is not validated before the activation of M2M services, this need to be regularized with strict measures.

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