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**NTT-Transatel's Comments - the Consultation Paper on Embedded SIM for M2M Communications**

Reference	TRAI Declaration	Transatel Comment
1.20 4.c	<ul style="list-style-type: none"> <li>Point 1: The mobile operators will be using IMSI or the numbering series which have not been allotted to them.</li> <li>Point 2: There is no Inter-circle/Intra-circle roaming available to these connections.</li> </ul>	<ul style="list-style-type: none"> <li>Point 1: TRAI understanding is correct here the provider will not be using the IMSI or numbering series from the DoT, but rather using ITU allocated series. In case, TRAI-DoT suggest that the IMSI or numbering series should be locally allocated, Transatel-NTT has a process in place called 'IMSI Transfer Agreement' by which global IoT operators such as Transatel-NTT transfer ownership of an IMSI range of their 901 MNC (i.e. a sub-MNC range) to a local operator/partner, who would register locally this sub-MNC range with the regulatory authorities. Therefore, thanks to this IMSI Transfer Agreement (ITA), this resource becomes local and is governed by local regulations without being subject to Permanent Roaming restrictions.</li> <li>Point 2: Yes, inter-circle/intra-circle within local MNO is not a part of the agreement global IoT operator like Transatel-NTT signs with partner MNO. But because Transatel-NTT has agreement with multiple MNO, the challenges are reduced</li> </ul>
1.20 4.d iii	Such operators are not allowed to have connectivity from multiple TSP	<p>Some IoT services may require high availability and would benefit from multi-network access. At minimum, if dynamic multi-network roaming is not allowed, TRAI should consider allowing one IoT MVNO to get connectivity from multiple TSPs with the caveat that each SIM can only attach to one network. For example, partnering with one TSP for one project and another TSP for another project. Each individual IMSI would be allowed to attach to only one network.</p> <p>Using the 901 MCC based MVNO model brings maximum flexibility to the enterprises, this includes having access to multiple MNO network via single SIM, and/ or multi-IMSI solutions, and/or on-boarding a local MNO of choice with customized commercial agreements.</p>

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<p><b>1.20</b> 4.g</p>	<p>Taking control of M2M device activities and effectively detecting roaming devices in the network are among the list of challenges if operators want to optimize network performance and reduce operational and signaling costs.</p>	<p>The unilateral agreement that Transatel-NTT signs with local MNOs usually take signal cost into consideration, also there is set definition about network performance &amp; congestion.</p>
<p><b>2.13</b> Q1</p>	<p>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?</p>	<p>The recommended timeline of 3 years does not need review</p>
<p><b>2.14</b> Q2</p>	<p>Whether there is a need to change the controlling SM-SR from the foreign agent (TSP/non-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?</p>	<p>Transatel-NTT does not suggest TRAI to impose change of controlling SM-SR as necessary. Reason being-</p> <ul style="list-style-type: none"> <li>○ there is no privacy issue because the SM-SR does not have access to sensitive data.</li> <li>○ security issues, if the concern is that a foreign SM-SR could harm the device on purpose, then an SM-SR swap process would not 100% prevent it. Technically, nothing would prevent the foreign SM-SR to keep secretly eUICC keys to control the eUICC at a later stage.</li> <li>○ moreover, enforcing a change of SMSR would add unnecessary costs which may impair smooth innovation deployment in India</li> </ul> <p>If the change of SM-SR would become mandatory, then an additional 1-year delay should be considered on top of 3-year timeline suggested by TRAI</p>
<p><b>2.15</b> Q3</p>	<p>Whether there is a need for the SM-SR of each TSP to be integrated with the SM-DP of other TSPs? If yes, what should be the methodology for integration? Please specify the timelines also</p>	<p>Transatel-NTT does not see the need for the SM-SR of each Indian TSPs to be integrated with other Indian SM-DP's TSPs. Also, this is purely based on business considerations and agreements between Indian TSPs.</p>

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<p><b>2.16</b> Q4</p>	<p>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 a swap?</p>	<p>Transatel-NTT does not see the need to prescribe and organize the SM-SR swapping between Indian TSPs. Also, this is purely based on business considerations and agreements between Indian TSPs.</p>
<p><b>2.17</b> Q5</p>	<p>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?</p>	<p>It depends on the services, and who pays for the cellular connectivity.  <b>For example:</b> in case of connected Car (Telematics, or navigation or Wi-Fi on board)          Telematic service provided by an OEM where the underlying connectivity is paid by the OEM, then it is not the role of the user to control the switchover.          If the service is a Wi-Fi on-board service directly paid by the end user, then the end user should be able to control its connectivity. In that case the more relevant method is to implement the eSIM consumer specifications of the GSMA standard.</p>
<p><b>2.18</b> Q6</p>	<p>Whether non-TSP entities, such as OEMs and M2M Service Providers, should be permitted to own SM-SR and manage the subscribed profiles<sup>34</sup> for their devices?          If yes, what should be the methodology and procedure?</p>	<p>Yes, OEMs and M2M service providers should be permitted to own their SM-SR.          This is even a recommended best practice for these stakeholders to keep their independence from TSPs. This is the model widely adopted by a lot of automobile manufacturers all over the world.</p>
<p><b>2.24</b> Q7</p>	<p>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.</p>	<p>Yes, Transatel-NTT supports use of 901.XX MCC for M2M/ IoT use. Dynamic multi-operator would be ideal in order to sustain Critical / High Availability IoT services (security, transportation). If not possible, at least agreement with several TSPs should be allowed so as to deploy specific projects with specific TSP (for example, JIO may be better suited for a certain project where high bandwidth is required, where BSNL may be preferred for another project with low bandwidth and low-cost requirement). IoT MVNO will need to ensure that SIMs allocated to a specific project can only attach the partner TSP for that project.</p>

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		<p>For TRAI’s consideration, operators and/or it’s affiliates providing IoT solution using 901-XX MCC</p> <ul style="list-style-type: none"> <li>• Be registered under the scope of M2MSP guidelines and M2M License</li> <li>• Be recommended to localize IMSI range, through IMSI transfer agreement, explained above</li> <li>• Be locally present and subject to all legal request requested by TRAI/ DoT for interception within the legally reasonable timeline</li> </ul>
2.29 Q8	<p>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.</p>	<p>Transatel- NTT wants to bring to the attention of TRAI a specific use-case of Connected Car (combination of OEM based services and end-user services). Here, through a single SIM/eSIM, OEM provides services such as engine Telematics, eCall, Over-the-Air updates (software, firmware, maps, etc.) and end-user services like infotainment packages (like Music stream platforms), navigation &amp; Wi-Fi on-board.</p> <p>TRAI should consider the methodology to allow IoT solution providers to provide both OEM services and end-user services through same SIM/eSIM. As an example, this model is implemented in markets like the USA, Europe, Japan, Australia etc.</p>
Q9	<p>Give your comments on any related matter that is not covered in this Consultation Paper.</p>	<p>Transatel- NTT wants to bring to the attention of TRAI about the upcoming convergent M2M/Consumer GSMA specification, which the office TRAI might already be aware</p> <p>A first functional specification SGP.31 has recently been released in April 2022. This new specification is mostly based on the consumer specification but has introduced new components: eSIM (eSIM IoT remote manager), allowing to remotely control the iPA (IoT profile assistant, replacing the LPA concept).</p>

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