

Bharti Airtel Ltd.
India & South Asia
Airtel Center, Plot No. 16,
Udyog Vihar, Phase - IV,
Gurugram - 122 015
Haryana, India

www.airtel.in
Call +91 124 4222222
Fax +91 124 4243252



TRAI/FY25-26/027

1st August 2025

Shri Akhilesh Kumar Trivedi
Advisor (Networks, Spectrum and Licensing)
Telecom Regulatory Authority of India,
World Trade Centre, Nauroji Nagar,
New Delhi – 110029

Subject : Bharti Airtel's Comments on Consultation Paper on *the Regulatory Framework for the Sale of Foreign Telecom Service Providers' SIM/eSIM Cards for the use in M2M/IoT Devices meant for Export purposes*

Reference : TRAI's Consultation Paper dated 4th July 2025

Dear Sir,

This is in reference to TRAI's Consultation Paper on *the Regulatory Framework for the Sale of Foreign Telecom Service Providers' SIM/eSIM Cards for the use in M2M/IoT Devices meant for Export purposes* dated 04.07.2025.

In this regard, we are pleased to enclose our comments on the said consultation paper for your kind consideration.

Thanking You,

Yours' Sincerely,
For **Bharti Airtel Limited**

A handwritten signature in blue ink, appearing to read 'Rahul Vatts'.

Rahul Vatts
Chief Regulatory Officer

Encl: a.a

Preamble:

Airtel thanks the Authority for giving it the opportunity to comment on this critical Consultation Paper (“CP”) titled *the Regulatory Framework for the Sale of Foreign Telecom Service Providers' SIM/eSIM Cards for the use in M2M/IoT Devices meant for Export purposes*.

Machine-to-Machine (M2M) Communications and Internet of Things (IoT) together represent a huge opportunity for users, businesses as well as Governments, all around the world. They have significantly transformed the landscape of infrastructure across industries like energy grids, transportation systems, water supply networks and agriculture. The automation and seamless connectivity they bring has increased efficiency, convenience and innovation.

However, there are still several sectors/businesses/industry verticals that remain untapped and would be elevated if automation and intelligence were to be brought to end devices through M2M/IoT. Their potential, once unlocked, would make a transformative difference to both citizens and businesses globally.

If this were to take place, it would present a significant market opportunity for the manufacturers of M2M/IoT devices globally. And while the Indian industry is ready to grab this opportunity and **position India as an export hub for global M2M/IoT connectivity solutions**, until there is an **enabling and light-touch regulatory framework** to facilitate it, things will remain stuck in the realm of possibility. It is therefore imperative that the Indian Government introduce such a framework. And so it follows that this consultation comes at the most opportune time.

It may be noted that the M2M/IoT devices usually have SIMs/eSIMs soldered/embedded within them. **As a preference, manufacturers should be encouraged to use Indian TSPs' SIMs/eSIMs even in devices meant for export. This would be in line with the Make-in-India vision of the Government. Further, by generating revenue for Indian TSPs from the foreign users of such M2M/IoT solutions, it would enhance the foreign exchange reserves of the country in the long term.**

However, it is important to note here that it is technically unfeasible to change the SIMs/eSIMs, once they are soldered/embedded on M2M/IoT devices. Thus, in the devices meant for export, some customers may require the manufacturers to use the SIMs/eSIMs of the local telcos of the country in which the devices are proposed to be actually used (instead of Indian TSPs). In this context, it is essential to allow Indian operators to import and sell foreign SIMs/eSIMs to Indian manufacturers, for use in M2M/IoT devices meant for export.

Additionally, while a **policy allowing sale/rent of International Roaming (IR) SIM Cards/ Global Calling Cards (GCCs) of foreign operators in India does exist**, it is relevant in the **context of P2P SIMs for individual users travelling to foreign countries for a limited time**, rather than for M2M/IoT devices meant for export. These M2M/IoT devices are likely to be deployed in a foreign country for a much longer time period than the IR SIMs/GCCs, probably until their end of life (i.e. 10-15 years, on average). Moreover, SIMs/eSIMs for use in M2M/IoT devices would be sold to manufacturers of such devices and be governed by enterprise-level agreements (as opposed to direct sale of IR SIMs/GCCs to end users).

Thus, sale of foreign TSP SIMs/eSIMs in India for use in M2M/IoT devices meant for export, is vastly different in nature from sale/rent of IR SIMs/GCCs. Accordingly, it may not be appropriate to adopt the same policy for both the activities – **separate guidelines would prevent any ambiguity and consequent interpretational/operational challenges.**

Moreover, technological evolution has now made it possible to import only the profiles of foreign TSPs (without the actual SIM hardware). In the proposed policy, it is therefore critical to **allow both the use cases – import of only foreign TSP SIM/eSIM profiles as well as import of profiles along with the SIM hardware.**

Similarly, it is possible that M2M/IoT devices meant for deployment in India are manufactured/assembled outside the country – necessitating Indian TSPs to export their SIMs for use in devices meant for import. It is important to **allow the export of Indian TSP SIMs/eSIMs as well as SIMs/eSIMs embedded in SIM modules/IoT devices, for use in M2M devices/machines meant for import.**

In summary:

- ✓ *New guidelines should be introduced for regulating the sale of foreign TSPs' SIMs/eSIM cards in India for the use in M2M/IoT devices meant for export purposes – separate from the existing policy on NOC for sale/rent of IR SIM Cards/ GCCs of foreign operators in India.*
- ✓ *DoT should coordinate with the Ministry of Finance to lay down a clear framework allowing:*
 - *import of foreign TSP SIM/eSIM profiles only as well as SIM profiles along with SIM hardware – for use in M2M/IoT devices meant for export*
 - *export of Indian TSP SIMs/eSIMs as well as SIMs/eSIMs embedded in SIM modules/IoT devices – for use in M2M devices/machines meant for import*
 - *import/export of M2M/IoT devices with SIM/eSIMs soldered/embedded therein*

Airtel now provides its replies to the specific questions asked, in the sections that follow.

Q1. Which of the following approaches should be followed for regulating the sale of foreign telecom service providers' SIMs/eSIM cards in India for the use in M2M/IoT devices meant for export purposes:

- (a) To introduce a new service authorisation for the sale of foreign telecom service providers' SIMs/eSIM cards in India for the use in M2M/IoT devices meant for export purposes under Section 3(1)(a) of the Telecommunications Act, 2023; or
- (b) To include the activity of the sale of foreign telecom service providers' SIMs/eSIM cards in India for the use in M2M/IoT devices meant for export purposes within the scope of the proposed service authorisation for the sale/rent of international roaming SIM cards/global calling cards of foreign operators in India?

Please provide a detailed response with justifications.

&

Q2. In case it is decided to introduce a new service authorisation under Section 3(1)(a) of the Telecommunications Act, 2023 for the sale of foreign telecom service providers' SIMs/ eSIM cards in India for the use in M2M/IoT devices meant for export purposes, what should be the terms and conditions for such a service authorisation? Please provide inputs with respect to the following aspects:

- (a) Eligibility conditions for the authorisation;
- (b) Application processing fee for the authorisation;
- (c) Period of validity of the authorisation and conditions for its renewal;
- (d) Service area of the authorisation;
- (e) Scope of service of the authorisation;
- (f) Authorisation fee;
- (g) Know-Your-Customer (KYC) requirements of the customers of the SIM/eSIM;
- (h) Period for which a foreign SIM/eSIM should be permitted to remain active in India for testing purposes;
- (i) Penalties for non-compliance;
- (j) General, commercial, and operating conditions etc. of the authorisation; and
- (k) Any other aspect.

Please provide a detailed response with justifications.

&

Q3. Alternatively, in case it is decided to include the activity of the sale of foreign telecom service providers' SIMs/eSIM cards in India for the use in M2M/IoT devices meant for export purposes within the scope of the proposed service authorisation for the sale/rent of international roaming SIM cards/global calling cards of foreign operators in India, what amendments should be made in respect of the following terms and conditions of the said service authorisation:

- (a) Scope of service;
- (b) Eligibility conditions for the authorisation;
- (c) Application processing fee for the authorisation;
- (d) Period of validity of the authorisation and conditions for its renewal;
- (e) Service area of the authorisation;
- (f) Authorisation fee;
- (g) General, commercial, and operating conditions etc. of the authorisation;
- (h) Any other aspect?

Please provide a detailed response with justifications.

Airtel Response:

At the outset, as submitted in the Preamble above, we request that **the Government should encourage manufacturers to use SIMs/eSIMs of Indian TSPs, even in the M2M/IoT devices meant for export.** This would facilitate generation of revenue for Indian TSPs from international customers of global M2M/IoT connectivity solutions – in turn, strengthening the nation's foreign exchange reserves. If Indian TSPs are accorded such preference, it would also align with the Make-in-India initiative.

Without prejudice to the above submission, we acknowledge the need to permit sale of foreign TSPs' SIMs/eSIM cards in India for the use in M2M/IoT devices meant for export purposes, in order to accommodate specific requirements of the users of such devices.

Currently, sale/rent of IR SIM Cards/GCCs of foreign operators in India is governed by the 'Revised Policy for Issue/Renewal of NOC for Sale/Rent of International Roaming SIM Cards/Global Calling Cards of Foreign Operators in India' dated 14th January 2022.¹

Clause 13 of Part-1 (General Conditions) of the said Policy provides that *"The procedure to be followed to issue NOC on such applications which propose to offer some APP based services or other innovative solutions shall be decided by DoT on case by case basis"*. Hence, the extant policy is flexible enough to cover the sale of foreign TSPs' SIMs/eSIM cards in India for use in M2M/IoT devices meant for export purposes.

However, it is important to recognize the difference between the two use cases – while IR SIMs/GCCs are targeted towards individual travelers visiting a foreign country for a limited time period, M2M/IoT devices would be deployed in a country for a longer period, probably till end of life of such devices. Further, IR SIMs/GCCs are sold directly to the end user, whereas SIMs/eSIMs for use in M2M/IoT devices would be provided to manufacturers of such devices.

Thus, **there are multiple provisions under the extant policy, which may not be relevant for M2M SIMs. For instance, end user KYC, publication of tariff plan, issuance of itemized bills, grievance redressal, etc.** (detailed below) all fall into that category – **necessitating a new policy.**

¹ Available at pg. 49-62 of the instant CP

Moreover, there is no corresponding provision empowering DoT to consider innovative use cases on case-to-case basis, in the terms and conditions of the service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India' proposed by the Authority in its Recommendations dated 18th September 2024 on the 'Framework for Service Authorisations to be Granted Under the Telecommunications Act, 2023'.²

In this context, **the introduction of a new set of guidelines for the sale of foreign TSPs' SIMs/ eSIM cards in India for the use in M2M/IoT devices meant for export purposes – separate from the existing policy on sale/rent of IR SIMs/GCCs – would enable formulation of specific guidelines with no ambiguity.**

The terms and conditions for the sale of foreign TSPs' SIMs/ eSIM cards in India for the use in M2M/IoT devices meant for export purposes, under such new guidelines, should be as follows:

(a) Eligibility conditions:

Under the extant policy, any registered Indian company may apply for NOC for sale/rent of IR SIM Cards/GCCs of foreign operators in India. The Authority has also recommended similar eligibility criteria for proposed service authorisation for the 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India'.

However, it may be noted that this extant policy as well as the proposed authorisation is only meant for the sale of foreign SIMs/GCCs to individual customers travelling from India to a foreign country for a limited period of time. In the case of sale of foreign TSPs' SIM/ eSIM Cards for the use in M2M/IoT devices meant for export purposes, the devices in question are meant to be deployed in the foreign country for a longer period – as part of larger IoT connectivity solutions.

In order to sustain the global connectivity solutions served through these devices, it is essential to ensure continuity of business operations. Thus, in the interests of the users, it may be appropriate to prescribe a more stringent criteria of eligibility – **UL (Access/ M2M) and M2MSP Licensees, along with a minimum net worth threshold.**

(b) Application processing fee:

The extant policy prescribes a minimal processing fee of INR 5000 for an application for issue/renewal of NOC for sale/rent of IR SIM Cards/GCCs of foreign operators in India. Even the Authority has recommended an application processing fee of INR 5000 for the proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India'.

However, as submitted above, in order to ensure continuity of global M2M/IoT connectivity solutions, it is important to ascertain that the prospective players are able

² https://tra.gov.in/sites/default/files/2024-11/Recommendation_18092024.pdf

to sustain themselves in the long run. Accordingly, the applicants should be required to pay an application processing fee, as well as an entry fee.

Airtel suggests that **an appropriate amount may be prescribed for both the application processing fee and the entry fee – so as to balance the twin objectives of facilitating the niche M2M/IoT device export sector, while simultaneously ensuring the entry of only serious players.**

(c) Period of validity and conditions for renewal:

Under the extant policy, the NOC for sale/rent of IR SIM Cards/GCCs of foreign operators in India, is granted for a period of 3 years. However, the Authority has recommended a validity period of 10 years for the proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India'.

Airtel submits that the average life span of M2M/IoT devices is 10-15 years. Once deployed, it is essential to ensure continuity to sustain the global connectivity solutions powered through such M2M/IoT devices. Therefore, Airtel suggests that a minimum validity period of **10 years** would be appropriate to protect the interests of users as well as investors. It would also put Indian operators on an equal footing with the foreign M2M/IoT industry and allow the operators to effectively compete with their foreign counterparts.

(d) Service area:

While there is no explicit provision for a service area under the extant policy, the NOC granted under the same is for the sale/rent of IR SIM Cards/GCCs of foreign operators *in India*. The Authority has also recommended that the proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India' should be granted for the National service area.

Airtel suggests that the service area for sale of foreign TSPs' SIM/eSIM Cards for use in M2M/IoT devices meant for export purposes, should also be **pan-India**.

(e) Scope of service:

In line with the subject matter of the instant CP, the scope of service should be the sale of foreign TSPs' SIM/eSIM Cards for the use in M2M/IoT devices meant for export purposes.

(f) Authorisation fee:

The extant policy does not require payment of any fee, apart from the application processing fee, for the NOC for sale/rent of IR SIM Cards/GCCs of foreign operators in India. Even the Authority has recommended a NIL authorisation fee for the proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India'.

In line with the above, the authorisation fee for the sale of foreign TSPs' SIM/eSIM Cards for use in M2M/IoT devices meant for export purposes, should be **NIL**. In any case, the SIMs/eSIM Cards belong to foreign operators and the M2M/IoT devices are meant for export. Since the telecom services (M2M connectivity) are being provided by foreign operators outside India, there may be no justification for the imposition of any authorisation fee on the same.

(g) Know-Your-Customer (KYC) requirements of the customers of the SIM/eSIM:

The extant policy requires NOC holders to establish the authenticity of a customer before selling/renting IR SIM Cards/GCCs for foreign operators to them. The NOC holder is required to obtain a copy of the passport of the customer, including copy of valid visa and additional proof of identity (PoI) and proof of address (PoA) as per the prescribed document-based PoI/PoA process or alternate digital KYC process prescribed by DoT for issuing new mobile connection. For countries where visas are not required for Indian Nationals or where visas are issued on arrival to them, a copy of a valid travel ticket, along with an undertaking from the customer mentioning the name of the country they intend to visit, may be obtained in place of a copy of the visa.

The Authority has also recommended similar KYC requirements under the terms and conditions for the proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India'.

However, when it comes to the sale of foreign TSPs' SIM/eSIM Cards for use in M2M/IoT devices meant for export purposes, **the KYC requirement should be restricted to the entity procuring the SIMs/eSIM Cards for soldering/embedding into M2M/IoT devices. Since these devices are meant for export and would be used outside India, there may be no requirement of KYC of the end user or the actual custodian of the M2M SIM/eSIM Card.**

Imposition of end user KYC requirement would put an unnecessary compliance burden on Indian operators wishing to provide global M2M/IoT connectivity solutions, and put them at a disadvantage vis-à-vis foreign operators. On the other hand, **light-touch norms would enable the vision of India developing as the preferred manufacturing destination and leading the global market as an export hub for M2M/ IoT devices.**

(h) Period for which a foreign SIM/eSIM should be permitted to remain active in India for testing purposes:

Under the extant policy, the IR SIM Cards/GCCs of foreign operators are for use only outside India. However, it is permitted to activate them, if it is essential for making test/emergent calls, for a limited period of 48 hours prior to departure and 24 hours after arrival. The Authority has also recommended a similar clause under the terms and conditions for proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India'.

However, in case of sale of foreign TSPs' SIM/eSIM Cards for the use in M2M/IoT devices meant for export purposes, it may be appropriate to prescribe a longer period, say **6 months**, for which a foreign SIM/eSIM may be permitted to remain active in India for testing purposes. This would enable testing across different lifecycle stages of manufacturing of M2M/IoT devices – service integration, end of line testing, pre-dispatch checks, etc. Such a duration is based on the experience with Indian customers deploying M2M/IoT solutions within the country.

Airtel further suggests that **there should be a provision to extend this period of 6 months, on a case-to-case basis**, for manufacturing set-ups where testing times could be higher due to longer production lifecycles, higher lead time for component procurement, or delay in the production set-up due to unforeseen circumstances.

(i) Penalties for non-compliance:

As per the extant policy, NOC holders are liable to pay a fine of INR 500 per IR SIM/ GCC, for every extra hour of activation in India. Further, the Authority has recommended that the Adjudicating Officer appointed by the Central Government in accordance with the provisions of the Telecom Act, may, pursuant to an inquiry, inter alia, impose a financial penalty in case the terms and conditions of the proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India' are breached.

It is important to remember here that the ecosystem for export of M2M/IoT devices from India is still nascent. Favourable policies at this stage would enable India to emerge as an export hub for global M2M/IoT connectivity solutions. Hence, in case of sale of foreign TSPs' SIM/eSIM Cards for the use in M2M/IoT devices meant for export purposes, **penalties, if any, should be minimal.**

(j) General, commercial, and operating conditions etc.:

(i) Updation of Record:

The extant policy requires NOC holders to intimate DoT, within 15 days, of any change in the information provided at the time of application. The Authority has also recommended a similar clause under the terms and conditions for the proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India'.

However, in case of sale of foreign TSPs' SIM/eSIM Cards for use in M2M/IoT devices meant for export purposes, Airtel suggests that the **time period for updation of records should be increased to 30 days** – in the interests of ease of doing business and also of facilitating the expansion of the M2M/IoT device manufacturing & export ecosystem in India.

(ii) Simplification of Application & Reporting Formats:

The extant policy requires NOC holders to submit – on a monthly basis, to the designated security agencies – complete details of IR SIM Cards/GCCs (including the period), along with full particulars, including address of the customers to whom these cards have been sold/rented. A NIL report needs to be submitted in case of no sale/rent transaction during the concerned month. Further, a monthly report, containing a summary of the information submitted to the security agencies, has to be submitted to the DoT.

The Authority has also recommended a similar clause under the terms and conditions for the proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India'.

While submission of a monthly report may still be required in the case of sale of foreign TSPs' SIM/eSIM Cards for use in M2M/IoT devices meant for export purposes, the **particulars of the report may need to be modified** to suit the unique nature of the activity. **Operators may only be required to provide the details of the entity to whom such SIMs/eSIM Cards have been sold, the IMSI/MSISDN and origination country of the SIMs/eSIM Cards and their date of activation.**

Similarly, the formats of application and other reports to be filed, may also be reviewed and simplified, in line with the specific M2M/IoT use case – in the interests of ease of doing business.

(iii) Customer-Specific Provisions like Publication of Tariff Plans, Customer Care, Issuance of Itemized Bills, Grievance Redressal, Credit Limit:

The extant policy contains detailed requirements in respect of, inter alia, publication of tariff plans & prior intimation to customers, provision of toll-free customer care service, issuance of itemized bills, notification on crossing a certain pre-determined threshold of the credit limit availed, and grievance redressal mechanism. The Authority has also recommended similar clauses under terms and conditions for the proposed service authorisation for 'Sale/Rent of International Roaming SIM Cards of Foreign Operators in India'.

However, such provisions may not be relevant in case of sale of foreign TSPs' SIM/eSIM Cards for use in M2M/IoT devices meant for export purposes. **These transactions would be based on enterprise-level agreements; and it would, therefore, be appropriate to leave the terms & conditions relating to tariff, billing, grievance redressal etc. to mutual commercial negotiations between parties.**

Therefore, Airtel recommends that new guidelines should be introduced for regulating the sale of foreign TSPs' SIMs/eSIM cards in India for the use in M2M/IoT devices meant for export purposes – separate from the existing policy on NOC for sale/rent of IR SIM Cards/GCCs of foreign operators in India.

Q4. Whether there are any regulatory issues including those related to the agencies such as RBI, customs etc. in respect of the import of foreign telecom service providers' SIM/eSIM cards for the use in M2M/IoT devices meant for export purposes? Please provide a detailed response with justifications.

&

Q5. Whether there are any regulatory issues including those related to the agencies such as RBI, customs etc. in respect of the export of Indian telecom service providers' M2M SIMs/ eSIMs for the use in M2M/IoT devices meant for import purposes? Please provide a detailed response with justifications.

Airtel Response:

It is Airtel's sincere understanding that there is no restriction on the import or export of SIM/ eSIM Cards under the Foreign Trade Policy. However, the policy on devices with embedded SIMs is not as explicit. Due to this ambiguity, there are practical challenges that are encountered, while dealing with the customs authorities with respect to such consignments. In the interests of ease of doing business, there is a need to remove all ambiguity and explicitly enable such import/export.

Further, it is important to understand the different scenarios and use cases involved in import/export of SIMs/eSIMs.

In case of import of foreign TSPs' SIM/eSIM Cards for use in M2M/IoT devices meant for export purposes, there could be two possibilities:

- Import of foreign TSP profile only: In this scenario, the foreign TSP/IoT aggregator will provide its profiles to the Indian operator – who, in turn, will burn these profiles into the SIM hardware. The scope of import would be limited to import of foreign SIM profiles and the software platform used to manage these profiles.
- Import of SIM hardware with the foreign TSP profile: In this scenario, the foreign TSP/IoT aggregator will provide its profiles along with the SIM hardware. The scope of import will include both the SIM hardware and the SIM profiles, along with the software platform used to manage these profiles.

On the other hand, in case of export of Indian TSPs' M2M SIMs/eSIMs for use in M2M/IoT devices meant for import purposes, the SIM personalization guidelines mandate the personalization of Indian TSPs' SIMs within the country. Yet, there may be two possibilities:

- Export of Indian TSP SIMs: In this scenario, the SIMs of Indian TSPs get exported, and are soldered/embedded in the M2M/IoT device being manufactured outside the country but is meant for import back to India.

- Export of SIM modules/IoT device embedded with Indian TSP SIMs: It may also be possible that while an M2M/IoT device is assembled in a foreign country, the SIM module of that device is manufactured within India itself. Similarly, the end products, like vehicles, utility meters, PoS machines etc., may be assembled outside India, but the M2M/IoT devices fitted in these products, may be manufactured in India. In such scenarios, the SIMs of Indian TSPs are locally soldered/embedded in the SIM modules, or M2M/IoT devices, which in turn, are exported for fitting in the devices/end products.

In order to ensure a smooth import/export process with no hindrances at customs, all the above possibilities should be taken into account.

Therefore, Airtel recommends that DoT should coordinate with the Ministry of Finance to lay down a clear framework allowing DoT should coordinate with the Ministry of Finance to lay down a clear framework allowing:

- (i) import of foreign TSP SIM/eSIM profiles only as well as SIM profiles along with SIM hardware – for use in M2M/IoT devices meant for export
- (ii) export of Indian TSP SIMs/eSIMs as well as SIMs/eSIMs embedded in SIM modules/IoT devices – for use in M2M devices/machines meant for import
- (iii) import/export of M2M/IoT devices with SIM/eSIMs soldered/embedded therein

Q6. Whether there are any other issues related to the subject matter? Please provide a detailed response with justifications.

Airtel Response:

No comments.