



RJIL/TRAI/2025-26/523

1st August 2025

To,

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

Subject: RJIL's comments on 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.

Dear Sir,

Please find enclosed the comments of Reliance Jio Infocomm Limited (RJIL) on the 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.

Thanking you,

Yours Sincerely,
For **Reliance Jio Infocomm Limited**

Kapoor Singh Guliani
Authorized Signatory

Enclosure: As above

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**Reliance Jio Infocomm Limited's comments on TRAI's Consultation Paper on
"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 4th July 2025**

Preface:

1. Reliance Jio Infocomm Limited (RJIL) thanks the Authority for giving an opportunity to offer comments on the consultation paper on **Regulatory Framework for the Sale of Foreign Telecom Service Providers SIM/eSIM Cards for the use in M2M/IoT Devices Meant for Export Purposes.**
2. We submit that eSIM, defined as an embedded universal integrated circuit card (eUICC) by GSMA, has many advantages over the legacy plastic SIM cards, as it is soldered directly into the device hardware. **It provides flexibility of immediate connectivity and survival in hostile environments with extreme temperatures, humidity or vibrations, making it most suitable for Machine to Machine (M2M) or Internet of Things (IoT) connected devices and wearable connected devices.**
3. The adoption of eSIM is increasing at high pace in M2M devices **due to flexibility provided by simultaneous multiple profiles and remote provisioning along with suitable form factor and associated security aspects and it is an important part of the devices being exported from India.**
4. It is pertinent to mention here that owing to the Government's forward-looking policies under the **'Make in India'** initiative, the country is attracting key global original equipment manufacturers (OEMs) and is fast emerging as a new hub for exporting of various devices / equipment embedded with foreign M2M and IoT SIMs or eSIMs. Owing to the global demand for smart devices, preferably embedded with eSIMs of the country where these devices are to be used, the Indian manufactures are required to embed the SIMs at production stage only. Thus, it is critical that a well-defined regulatory framework based on the principles of light touch regulation and ease of doing business is in place. This policy should help facilitate the Indian manufactures meet the testing and prototyping requirements so that the objectives of 'Make in India' initiative.
5. **Evidently, one of the major use cases of eSIM in M2M devices will be the foreign operator's eSIM fitted in the devices to be exported by Indian manufacturers. We submit that this use case will not fit within the existing NOC policy for the sale of SIMs of foreign operators due to KYC and compliance requirements.**
6. Additionally, this will not be a scenario where the traveler will acquire the SIM when he/she is going outside India, but in this case, **the foreign SIMs fitted in M2M devices will be in India for a considerable duration and may need to be activated for testing purposes. Therefore, it is imperative that a regulatory framework is put in place for this specific use case.**

A. Eligibility to offer the services

7. In view of the massive role and significance of eSIM in M2M communications and its rapidly increasing adoption in consumer devices segments meant for export purpose, **it is imperative that the regulatory oversight is settled and made facilitative to the impending growth.**
8. We submit that in normal scenario, the existing NOC for sale of retail foreign SIMs enables the holder to offer communication services to Indian users going abroad, however, in the special use case of foreign eSIM enabled M2M devices being exported from India, additional safeguards may be required due to the incremental requirements of testing and roaming connectivity. **Therefore, we submit that NOC should be provided only to the entities holding Unified License or M2MSP registration that also comply with Additional terms and conditions for owning and managing SM-SR in India as per DoT instructions dated 26.06.2025.**
9. Furthermore, as only MNO can provide support for other elements including Indian connectivity, the prospective customers such as Automotive manufactures, Device OEMs should acquire the SIM cards/eSIM only from them. In this case, Indian MNO/M2MSP will be acting purely as enabler for customer.

B. Know your Customer (KYC) and other requirements for M2M SIMs for export

10. As the existing NOC (and TRAI recommendation on Authorization) is meant specifically for retail Indian customers travelling outside India with foreign SIM cards or global calling cards, the KYC norms and regulation for activation of SIMs (within 48 hours in arrival and before 24 hours prior to leaving India) would not be suitable for foreign M2M SIMs being exported post being fitted into devices. We suggest that a light touch regulatory framework should be proposed for this service.
11. We recommend a separate KYC policy based on very light touch regulatory approach for this use case of M2M foreign SIMs to be exported, as the existing retail KYC norms for foreign SIMs, with limited time and geography requirements, are not suitable for this use case. We submit that in this case, the authorised entity should be required to maintain only the name and details of the OEM seeking SIMs along with the number of SIMs (and country of origin of the SIMs) assigned to the OEM. The OEM/Customer should be required to take M2MSP registration and would be required to maintain the details pertaining to Device vendor, device details, foreign operator details, total count of such IMSIs and IMSI vs IMEI mapping. End customer and device vendor will be responsible for all data availability. The Authorised entity will be responsible for submitting the details maintained by it to the DOT on an annual basis.
12. Further, as the SIMs will be used in varied devices like motor vehicles, wearables, smart meters, connected cameras, GPS trackers, Smart Car devices, remote sensors, asset trackers etc. the testing and assembly requirements will be equally varied. Accordingly, we submit that sufficient time for testing would be required for these devices. We recommend a

3-month time for these devices to remain active in India for testing and assembly, with possibility of extension on case-to-case basis.

13. The custodian details of SIMs post export should not be mandated, as we understand that custodian of foreign SIM cards for export may also depend on the regulations of the country where the M2M device with SIM is being exported and it should be left to market forces. However, as long the SIM is in India, Authorized entity should be responsible for ensuring that there is no unauthorized connectivity provided to SIMs.

14. Further, the traffic routing through India should not be mandated since it may impact the performance of use cases. The operating and commercial arrangements for the M2M customers should majorly be under Forbearance.

15. Conclusions

1. There is a need to put in place a separate authorization based Regulatory Framework for the sale of Foreign Telecom Service Providers SIM/eSIM cards for the use in M2M/IoT devices meant for export purposes.
2. Only the Unified Licensees with access service authorization and M2MSPs complying with additional conditions for operating SM-SR in India should be eligible for this Authorization.
3. The Authority should recommend a light touch regulatory framework.
4. The KYC requirements and other compliances need to be simplified in view of the M2M use case of the service.

Issue wise comments.

Q.1. 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.

RJIL Comments:

1. As explained in the preface, there is a stark difference between the NOC (and proposed service authorisation) for the sale/ rent of international roaming SIM cards/ global calling cards of foreign operators in India and sale of foreign telecom service providers SIM/eSIM cards for the use in M2M/IOT devices meant for export purposes as these are starkly different use cases.
2. The differences include and are not limited to the type of customers, type of usage, testing requirements. Therefore, there is no case for including 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 existing NOC (or proposed service authorisation) for the sale/ rent of international roaming SIM cards/ global calling cards of foreign operators in India. Accordingly, we submit that the Authority should recommend issuance of a separate Authorization specifically for this use case.

Q. 2 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.

RJIL Comments:

(a) Eligibility conditions for the authorisation;

1. Only the Unified License holders with Access Service authorizations or M2MSP complying with additional conditions for SM-SR in India should be eligible for this authorization, as there will be a requirement for testing the imported M2M SIMs inside India by latching onto a network under international roaming. The consequent network security and integrity implications can be addressed by permitting the offering of these services by regulated entities only.

2. We further submit that all manufacturers desirous of embedding the foreign SIMs in their products can obtain the Authorization post registering under M2MSP registration to meet this requirement.

(b) Application processing fee for the authorisation;

3. As the applicants will be already a licensee or authorization holder, there is no need for extensive application processing fee and the TRAI proposed application fee (in case of NOC) of Rs. 5000 should suffice to cover the processing expense.

(c) Period of validity of the authorisation and conditions for its renewal;

4. We submit that a 10-year authorization period will suffice, and renewal should be processed 1 year prior to expiry, in case there are no adverse actions pending against the authorized entity.

(d) Service area of the authorisation; National service area

(e) Scope of service of the authorisation;

5. The Authorised Entity should be permitted to import International Roaming SIM Cards (including eSIM) of Foreign Operators in India and export of these SIMs fitted in M2M as per the following scope:

Selling or renting of Subscriber Identity Module (SIM)/eSIM owned by Foreign Cellular Mobile Service Providers to any M2M service provider or OEM in India intending to export India made devices abroad.

6. The end customer's scope should be limited to embedded SIM/eSIM on devices and testing in limited period and within factory environment, area specified by device and end user for testing. If such sims are found to be roaming post-test period, then DOT can direct India TSP to disable roaming or blacklist such connections.

(f) Authorisation fee;

7. Nil, as this is an ancillary service to 'Make in India' Initiative, no authorisation fee should be applicable on the revenue generated under this service. The revenue from this service should be deductible from ApGR for access service authorization holders.

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

8. As submitted above, we recommend a separate KYC policy based on very light touch regulatory approach for this use case of M2M foreign SIMs to be exported, as the existing retail KYC norms for foreign SIMs, with limited time and geography requirements, is not suitable for this use case. We submit that in this case, the authorised entity should be

required to maintain only the name and details of the OEM seeking SIMs along with the number of SIMs (and country of origin of the SIMs) assigned to the OEM. The OEM/Customer should be required to take M2MSP registration and would be required to maintain the details pertaining to Device vendor, device details, foreign operator details, total count of such IMSIs and IMSI vs IMEI mapping. End customer and device vendor will be responsible for all data availability. The Authorised entity will be responsible for submitting the details maintained by it to the DOT on an annual basis.

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

9. The foreign SIM should be allowed to remain active in India for maximum 3 months for testing purpose only. In case the user requires additional time, then case to case extension should be provided by DoT through an online portal. Usage made in India through these SIM/eSIMs to be considered as International Roaming for charging purpose.

(i) Penalties for non-compliance;

10. We submit that Authorization only enables the service providers to provide foreign SIMs to devices/customers going out of the country and imposing penalties may be disproportionate to the scope of service. Further, compliance can be ensured by issuing the authorization only to regulated entities, i.e. Licensees and M2MSP providers, who are also governed by their respective authorizations, therefore separate penalties for this activity will not be required.

**(j) General, commercial, and operating conditions etc. of the authorisation; and
(k) Any other aspect.**

11. As the transactions pertaining to imported M2M SIMs for export post fitting in devices will be B2B transactions, we request that commercial, or tariff-related requirements should be left to mutual agreement between parties.
12. There should not be any requirement for monthly reports to DoT or security agencies. The authorized entities should be required to submit an annual return of No. of foreign SIMs issued for export to OEMs or M2MSPs along with the name and details of the customer.
13. **Right to Inspection:** The Central Government or its authorised representative shall have the right to access and inspect the sites/ offices used for providing the Service. The Authorised Entity shall provide the necessary facilities and cooperate with the Central Government or its authorised representative. The inspection will ordinarily be carried out after giving reasonable notice except in circumstances in which giving such a notice will defeat the very purpose of the inspection.

14. The Central Government or its authorised representative shall have the right to seek documents/ information from the Authorised Entity, and it will provide the necessary documents/ information. The Authorised Entity shall preserve the user records for at least one year from the month of acquisition of user.

15. Suspension, Surrender, Termination/ Revocation of Authorisation:

- (i) The Authorised Entity may surrender the Authorisation, by giving a notice of at least 60 calendar days in advance. In such a case, it shall also notify all its users by sending 30 calendar days' notice to each user. The balance amount including the security deposit paid by the user, if any, available with the Authorised Entity shall be refunded to the user within a period of 30 days. The effective date of the surrender shall be the 61st calendar day counted from the date of receipt of such notice by the Central Government, if it is not rejected by the Central Government within 30 days of the date of receipt of the notice.
- (ii) The Central Government reserves the right to suspend the operation of the Authorisation, at any time, if, in the opinion of the Central Government, it is necessary or expedient to do so in public interest or in the interest of the security of the State or for the proper conduct of the telecommunication:

Provided that if situation so warrants, the Central Government may dispense with the issue of notice prior to such suspension. The decision of the Central Government shall be final and binding in this regard:

Provided further that the Central Government shall not be responsible for any damage or loss caused or arising out of aforesaid action:

Provided also that the suspension of the Authorisation shall not be a cause or ground for extension of the period of the Authorisation and suspension period will be taken as period spent.

- (iii) The Central Government reserves the right to terminate/ revoke/ suspend the Authorisation, at any time in the interest of the public by giving a notice of 60 calendar days from the date of issue of such notice: The

16. Central Government reserves the right to modify at any time the terms and conditions of the Authorisation, or incorporate new conditions, if in the opinion of the Central Government, it is considered necessary or expedient to do so in the interest of national security, public interest and for proper conduct of Telecommunication.

Q. 3. 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 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.

RJIL Comments: Not Applicable in view of the previous response

Q.4. 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.

And

Q.5. 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.

RJIL Comments:

We understand that there are no specific requirements in place for importing foreign operator SIMs and export of devices fitted with such SIMs. However, as an abundant caution, the Central Government should mandate that no additional burden/compliances should be imposed on the entities performing the activity of sale of foreign telecom service providers SIM/eSIM Cards for the use in M2M/IoT devices meant for export purposes, under the DoT authorization.

Q.6. Whether there are any other issues related to the subject matter? Please provide a detailed response with justifications.

RJIL Comments:

The following restrictions on Indian M2M SIM/eSIMs should not be applicable on the foreign operator's SIM to be used in in M2M/IoT Devices meant for Export purposes.

- a. Mandatory 13-digit MSISDN
- b. Connectivity restriction with respect to 100 IPs/URLs & 4 numbers for SMS/Voice
- c. Maintaining end user custodian details
- d. Exclusion of DKYC

As these issues will depend upon regulation of respective countries.