01 August 2025

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

Subject: Tata Communications Limited's response to TRAI 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,

This is with reference to the TRAI consultation Paper No. 06/2025 dated 04-07-2025 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"**

In this regard, please find enclosed herewith Tata Communication Limited's inputs for your kind consideration as **Annexure**.

We request you to kindly consider our submissions while finalizing the consultation paper and would be happy to provide any additional information, if required.

Thanking You,

Yours Sincerely,

Alka Selot Asthana
Global Head - Regulatory
Tata Communications Limited

Enclosed: As above

Annexure

Tata Communications Limited's response to TRAI 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"

Preamble

At the outset, we sincerely thank TRAI for inviting our views on the proposed regulatory framework pertaining to the use of foreign SIMs/eSIMs in IoT/M2M devices manufactured in India for export. In light of India's ascent as a global manufacturing hub for M2M/IoT devices—and in alignment with the Government's "Make in India" vision and emphasis on export-led growth—we believe it is both timely and strategic to develop a regulatory approach that is pragmatic, supportive, and minimally intrusive for this segment.

While international roaming SIMs and global calling cards from foreign operators have facilitated affordable mobile access abroad for many years, India's current NOC regime—intended for SIMs sold to outbound travellers—does not adequately address the distinct operational and compliance nuances of M2M/IoT exports. Specifically, evolving requirements around KYC, activation, and traceability for M2M/IoT use cases need a differentiated framework.

Presently, the provisioning of SIM/eSIM connectivity for M2M/IoT in India is effectively governed under the DoT's M2MSP Registration and relevant Unified Licence (UL/UL-VNO) authorization categories. These frameworks enable registered providers to supply SIM/eSIM cards for M2M/IoT use across multiple sectors, under robust compliance and oversight.

We respectfully submit that the optimal way forward is to retain regulatory alignment with the established M2MSP and UL frameworks for provisioning SIM/eSIMs in export-bound M2M/IoT devices. Rather than introducing a parallel authorization—or subsuming this activity under the existing foreign operator SIM regulations—the current framework could be further strengthened by incorporating export-specific operational guidelines to address any unique compliance concerns. This would ensure a unified regulatory path for all M2MSPs, minimizing complexity and supporting India's competitive advantage in global markets.

Introducing a separate authorization for this activity could lead to overlapping jurisdictions, redundant compliance obligations, and fragmentation within the M2M/IoT value chain. Such duplication could disrupt seamless coordination across service providers and impair the efficiency and scalability of export-oriented IoT solutions.

In summary, we advocate for a streamlined, export-friendly regulatory treatment that leverages India's existing M2MSP regime—supplemented by specific, pragmatic guidelines for export scenarios—to provide clarity and operational ease for registered providers, while fully meeting security and compliance objectives.

Tata Communications Ltd. issue wise response is as follows:

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.**

Tata Communications' Response:

- The sale of foreign telecom SIM/eSIM cards for M2M/IoT devices intended for export is fundamentally different from the sale/rent of international roaming SIMs or global calling cards. International roaming SIMs typically serve individuals or entities within India who temporarily travel abroad, involving consumer mobility and roaming use cases. However, M2M/IoT SIMs meant for export are embedded into devices that are manufactured or assembled in India but deployed overseas have distinct technical, regulatory and operational considerations, like bulk provisioning, different traffic patterns and long-term connectivity needs.
- In India, such technical and operational aspects have been already managed by the machine-to-machine communications services providers under the multiple license category granted by DoT, e.g., M2MSP Registration, UL/UL (VNO)-M2M Service Authorization, enabling service providers to provision SIM/eSIM cards in India for M2M/IoT devices as underlying connectivity network. Therefore, we strongly recommend that instead of introducing a new service authorisation or including the activity within the scope of authorization of roaming SIM cards/ global calling cards of foreign operators in India, the approach should be aligned with the existing framework governing the machine-to-machine communications in India for selling SIM/eSIM's in India. This will also ensure ease of regulatory framework for all existing M2MSPs in India for providing SIM/eSIM Cards for the use in M2M/IoT Devices meant for Export purposes under their existing M2MSP registration.
- TRAI may consider recommending guidelines or provisions to cater specific requirements for the sale of foreign Telecom Service Providers' SIM/eSIM cards for the use in M2M/IoT Devices meant for Export purposes, such as Enterprise KYC requirements (*not the KYC for each SIM embedded in the Device/Machine which would not be practically feasible*), period for which a SIM/eSIM should be permitted to remain active in India for testing purposes etc, within the existing machine to machine communications framework.

Justification:

- Machine-to-machine communications service providers have expertise to manage SIM/eSIM meant for M2M/IoT Devices, as they are already offering service within India.
- With this enablement, Machine-to-machine communications providers can offer end-to-end solution to enterprises including SIM/eSIM hardware, connectivity and lifecycle management.
- Existing domestic value-chain ecosystem can be easily formalized for the adoption of sale of foreign telecom SIM/eSIM cards for M2M/IoT devices intended for export. This will also expand the growth opportunities for the M2M/IoT sector.
- Machine-to-machine communications providers are well positioned to ensure Indian regulatory compliances related to import/export from foreign SIM/eSIM suppliers and use of roaming service from foreign connectivity providers.

- Existing machine-to-machine communications regulatory framework offers balanced and pragmatic approach to ensure compliances, accountability and operational strengths suitable to address requirement of Sale of Foreign Telecom Service Providers' SIM/eSIM Cards for the use in M2M/IoT Devices meant for Export purposes.
- Introducing a new service authorisation for this purpose would create redundancy and complexity within the existing regulatory framework, as required functions can be easily carried out under the existing M2MSP regulatory framework with introducing specific related provisions. Further, a new category of service authorisation could lead to fragmentation within the M2M/IoT value chain, with different entities handling similar services under different regulatory umbrellas. This will complicate the coordination across service layers and likely to introduce inefficiencies in the delivery of end-to-end IoT connectivity solutions.

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.

Tata Communications' Response:

- In view of our response provided in Q1 above, as reiterate that the existing M2M Service Provider (M2MSP) regulatory framework is well-suited to accommodate the proposed activity. Rather than introducing a new service authorisation, the TRAI should recommend DoT to consider issuing an addendum or supplementary guidelines under the current M2MSP framework to regulate the import, testing, and export of foreign SIMs/eSIMs. This would enable faster implementation, minimize disruption to the M2M/IoT ecosystem, and allow for centralized regulatory oversight.
- We are of the considered views that the existing M2M framework for machine-to-machine communications is capable of ensuring full regulatory compliance, including Enterprise KYC, SIM provisioning, service control and traceability, the creation of a new authorisation does not deliver a proportionate improvement in oversight.

- Moreover, Given the increasing global deployment of Make-in-India IoT/M2M devices and the Government's emphasis on manufacturing and exports, it is imperative to formalize a regulatory mechanism that allows the controlled use of foreign SIMs/eSIMs for testing and integration into export-bound devices in India. Regulating this activity under the existing M2MSP framework ensures regulatory continuity, ease of adoption, and alignment with the operational responsibilities and expertise of M2M SPs. These entities are already well-versed in KYC compliance, SIM lifecycle management, network usage protocols, and national security guidelines.

In case, if TRAI still assess the need for introducing 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, we wish to submit the following response to the points (a) to (k), which is based on our above recommendation that the approach for the sale of foreign telecom service providers' SIMs/ eSIM cards in India for the use in M2M/ IoT devices meant for export should be align to the existing machine-to-machine communications framework.

(a) Eligibility Conditions for the Authorisation:

- The applicant should be an Indian-registered company or LLP with the nominal net worth and paid-up capital.
- The applicant must have a valid agreement with a foreign telecom service provider and must not use the foreign SIMs/eSIMs for consumer telecom services in India.
- The applicant must follow all National security guidelines issued by DoT/MHA.
- The entities holding a UL-M2M/ UL(VNO)-M2M/ M2MSP Registration with DoT should not be required to obtain this service authorisation. M2MSPs are already actively engaged in the M2M/IoT sector and effectively understand the regulatory and operational requirements. Therefore, extending this activity under the existing M2MSP framework is logical and practical.

(b) Application Processing Fee for the Authorisation:

- The application processing should be nominal processing fee to cover administrative costs, as the service is limited in scope, in line M2MSP Registration.

(c) Period of Validity and Conditions for Renewal:

- The period of validity should be minimum 10 years and provision should be made in the authorisation for renewal one year prior to expiry of the validity period subject to: continued compliance to the T&Cs, no default or security violation, valid agreements with foreign TSPs.

(d) Service Area of the Authorisation:

- The service area should be National Area (pan-India).

(e) Scope of Service of the Authorisation:

- The scope of service should align with the existing M2M SP registration terms and conditions, with provisions specifically addressing the use of foreign SIMs/eSIMs and international roaming for IoT/M2M applications.
- Permitted activities: Import, store, and embed foreign SIMs/eSIMs in M2M/IoT devices. These SIMs/eSIMs may be sold only to OEMs/exporters for use in devices meant

exclusively for export. Usage should be limited to data and SMS services only; except calls made to emergency numbers like police, fire, ambulance, etc.
- Not permitted: Use of foreign SIMs/eSIMs for domestic connectivity or offering roaming services within India for consumer telecom services in India.

(f) Authorisation Fee:
- The authorisation fee should be nominal and no LF should be applicable on the revenue earned under this authorisation as the service does not generate any telecom revenue within India.

(g) KYC Requirements of the Customers of the SIM/eSIM:
- Given that in this specific case, the foreign SIMs/eSIMs are meant for embedded in devices and export, primarily Enterprise KYC should suffice instead of doing KYC and tracking for each SIM embedded in the Device/Machine, which would not be practically feasible.
- The M2M communications provider should maintain detailed records of device manufacturers and destination countries

(h) Period for which a Foreign SIM/eSIM Should Be Permitted to Remain Active in India for Testing:
- Activation of SIM is required in India for end of line testing or factory testing before the device or product is launched commercially in international market. As an industry practice all the OEM's (Device or Equipment or vehicle manufacturer) test their devices in factory or labs before actual production or commercial delivery. One of the key tests besides end-to-end testing of the device or equipment by OEM is to test the device on assembly line after embedding of the SIM on device to make sure the SIM and device are coupled properly and working fine. For which SIM cards need to be activated and should have data/sms to do so. Ideal duration of activation within India should be allowed for 6 Months as OEM's have to go through multiple phases of the tests and validations.
- A limited testing period balances innovation needs and regulatory control, preventing misuse of foreign SIMs on Indian networks.

(i) Penalties for Non-compliance:
- Penalties for non-compliance should inline with the existing penalty framework already in place under M2M communications licensing framework.

(j) General, Commercial, and Operating Conditions:
- The general conditions should provide operational transparency, legal compliance, and security safeguards.
- Value chain entities must ensure SIM/eSIMs are not used for consumer mobile communication services.
- Maintain audit trails and records for a minimum period of one year.
- Cooperation with regulatory and law enforcement agencies for any investigations as applicable.
- Comply with cybersecurity and data protection standards.
- Periodic reporting to DoT on sales volumes, export destinations and compliance.
- Prohibit resale or transfer of SIMs to unauthorised entities.

- Transparent commercial terms with manufacturers/exporters to avoid hidden practices.

(k) Any other aspect: Nil

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 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;
b. General, commercial, and operating conditions etc. of the authorisation;
c. Any other aspect?

Please provide a detailed response with justifications.

Tata Communications' Response:

- In view of our response provided in Q1 above, we again reiterate that instead of 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 proposed service authorisation for the sale/ rent of international roaming SIM cards/ global calling cards of foreign operators in India, the approach should be aligned with the existing M2MSP framework governing the machine-to-machine communications in India.

Justification:

- International roaming SIMs and global calling cards are designed primarily for human communication (voice, SMS, data services) and are typically used by travelers for short-term connectivity. In contrast, M2M/IoT devices operate with low-data, persistent, automated connections, often without human intervention. The functional, commercial, and technical nature of the two services is fundamentally different, making it inappropriate to regulate them under a common framework.
- M2M/IoT deployments require long-term lifecycle management of SIMs, including remote provisioning, bulk activation, suspension, firmware updates, and device-level diagnostics. These are not applicable to roaming SIMs or calling cards, which are mostly short duration in nature. A unified authorisation would fail to address the operational needs specific to M2M/IoT deployments.
- Including both services under a single authorisation could lead to complexity and additional compliance burden and service definitions. For example, applying the same KYC, billing, or usage conditions to both would not be practical or enforceable, given their different business models. This may create enforcement and interpretation challenges for the stakeholders.
- Entities that operate in the roaming SIM/global calling card space may not possess the technical expertise, contractual partnerships or business orientation to manage M2M/IoT

services effectively. Extending their license to cover such activities could result in misaligned incentives and inadequate service delivery for Enterprises.

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.

Tata Communications' Response:

- In our view and assessment, there are no major regulatory impediments currently imposed by agencies such as RBI or Customs regarding the import of foreign telecom service providers' SIM/eSIM cards, provided they are strictly used for integration into M2M/IoT devices manufactured in India for export purposes only. SIM/eSIM cards in such cases are treated as hardware components, and since they are not activated or used for domestic telecom services, no specific customs duties or restrictions typically apply. However, to avoid operational ambiguities and ensure smooth clearance, a distinct customs classification (e.g., "SIMs for export use only") can be introduced. Similarly, there is no direct forex exposure during import of inactive SIMs, and any B2B financial settlement with foreign MNOs for post-export services can be handled under the existing foreign exchange frameworks. RBI may consider issuing a clarificatory circular to ensure uniform interpretation by authorised banks.
- To ensure national security and regulatory compliance, it is important that these SIM/eSIMs are traceable and not diverted for domestic use. M2M Service Providers (M2MSPs), as registered / licensed entity under DoT, are best positioned to maintain oversight of the full SIM lifecycle—including KYC, inventory logs, and activation post-export—through legal and contractual agreements with foreign MNOs. A system of labelling and maintaining a digital audit trail should be implemented to distinguish export-bound SIMs from domestic ones. TRAI may consider mandating periodic declarations by M2MSPs and coordinating with agencies like Customs and RBI to ensure centralised compliance while enabling ease of doing business for India's growing IoT/M2M export sector.

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.

Tata Communications' Response:

- In our view and assessment, there are no major regulatory impediments currently imposed by agencies major regulatory barriers from RBI or Customs on the export of Indian telecom service providers' M2M SIMs/eSIMs for use in devices sent to foreign countries. However, procedural clarity is important to ensure proper traceability, compliance with licensing norms, and national security safeguards.
- Customs declarations should clearly identify such SIMs as "for international use only," and RBI may consider issuing clarifications treating export revenue under existing forex rules. DoT/TRAI may also issue specific guidelines under the M2M SP framework to ensure these SIMs are activated and used strictly outside India.

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

Tata Communications' Response:

TRAI is requested to kindly consider the below submissions for review of its earlier recommendations considering the fact that M2M & IoT sector in India is still at nascent stage and only a light touch regulatory registration framework is needed to support innovation and growth in this sector.

Use of ITU allocated shared Mobile Country Code 901.XX (Global IMSI) should be permitted in India for M2M Communication services

- 901.xx is a global IMSI series, not tied to any country, and have the capability to provide network-agnostic, cross-border connectivity seamlessly. This will help manufacturers to build equipment in any part of the globe and deploy anywhere. The ITU has reserved the 901 IMSI series specifically for cross-border M2M use-cases and directly allocates the same to service providers, i.e. typically to non-telecom companies. 901 IMSIs series is recognized IMSI series by telecom standardization and many of the operators and IoT service providers around the world have been allotted this series by ITU for global IoT deployments.
- Hence, it is our recommendation that 901.XX (Global IMSI series) needs to be recognized by TRAI/DoT for use for IoT/M2M usage by the M2MSPs and should continue to be allowed to be used in India. This will provide greater flexibility to end-users and will help in meeting global requirements. In the Global scenario, where the devices and users would be moving across countries, this feature will be contributing a lot in this mobility of users. For this purpose, a suitable light touch regulatory framework may be adopted in India for a collaborative ecosystem in line with Global practices, while keeping in mind the consumer and national interests. In the Global scenario, where the devices and users would be moving across countries, this feature will be contributing a lot in this mobility of users.
- Following methods can mitigate security, privacy and identity concerns regarding the use of 901.xx codes within Indian borders:
    - Regulating M2MSP – M2MSPs are regulated by DoT under its M2MSP registration requirements. M2MSP Registration Guidelines imposes requirements, such as inspections, security conditions etc. on M2MSPs, which will make them highly regulated entities, in line with National Security Interests.
    - Details of End users: As per M2MSP Registration Guidelines, M2MSPs are required to ensure maintenance of records of end users of devices.
    - Application Server Location: It has already been specified in the M2MSP Guidelines to inform DoT about the location of IT and Network systems, which will ensure that DoT is informed about the application server location of M2MSPs.
    - Lawful Intercept: The 901.xx IMSI owner can provide a mirror of the traffic when requested to the Indian regulatory authorities. This can even be managed through the local TSPs, on whose networks, connectivity will be provided. Security Obligations have already been placed by DoT on M2MSPs in the registration guidelines.
    - Mobile Numbering Series: All M2MSPs registered with DoT should also be allowed to apply for M2M Mobile Numbers which can be applied to 901 IMSIs. Mobile Operators would then be able to differentiate between traffic being routed on these specific 13-digit numbers and regular international or domestic MSISDNs. In

addition to this, as per the ITU directives, the 901.XX IMSI will be allocated directly by the ITU to respective entities, along with a numbering series.

Further, it may be noted that the 901 IMSIs series is recognized IMSI series by telecom standardization and many of the operators and IoT service providers around the world have been allotted this series by ITU for global IoT deployments. Hence, we recommend that 901 IMSI series should be recognized by DoT for use for IoT/M2M usage by the M2MSPs.

It is also submitted that with the use 901 IMSI profiles, it will be easy to detect the M2M devices on the network of TSP as network optimization is an independent exercise carried out by TSPs irrespective of the fact that whether it is for P2P or M2M communication. Network optimization and- performance monitoring are activities which are even today performed by operators daily. Therefore, TSPs can easily detect the changes happening with regard to traffic/ signalling load and can optimize the resources over time and there is no threat of any sudden network/signalling surge are resources can be augmented over time. In so far as detecting the roaming devices is concerned, it may be noted that TSPs enter into roaming agreements for enabling the roaming of devices.

The permanent roaming of foreign eUICC fitted devices in India should not be restricted for a time limit for M2M services and same should be left to the market forces and mutual roaming agreements between foreign TSPs and Indian TSPs.

- Foreign eUICC fitted devices roaming with Indian TSP's networks is a scenario of international roaming which works as per the mutual agreement entered between the foreign carrier (whose eUICC is fitted in the device) and the Indian TSP/TSPs with whom that foreign carrier has the roaming arrangement. Hence, roaming of an eUICC fitted devices in India should be left to the market forces and the roaming arrangement a foreign carrier has with Indian TSPs. We are of the view that there should not be any restriction or timeline for which international roaming of an eUICC fitted device should be allowed and any such roaming should be on permanent basis as per the terms of the roaming arrangement with Indian TSPs. Global models for M2M have evolved for unrestricted access across the borders due to the nature of services as use of device is not necessarily same as the country (or place) of manufacturing and any roaming restriction would significantly hamper the growth of M2M/IoT services. The M2M Service Provider (M2MSP) can support the customer information related activities for such devices as it is being done for the devices with local SIMs/profiles.

- However, in case a timeline is being prescribed for roaming of foreign eUICC fitted devices in India, then the TRAI earlier recommended period of three years should be continued and request TRAI to review its recommendation. This will enable sufficient time to end user and M2MSP to get the services transferred, without any service disruption thereby impacting end customers. There may be critical emergency devices which needs connectivity without any break in service. This period can be used by M2MSP in validating correct Profile set, features, timers and switching logics etc. as the technology and standards are still evolving and will take some more time to mature. The change requires several activities like switching of SM-SR, agreements for new India based profiles, testing and validation and then actual migration as per GSMA guidelines. Hence, three years period should be permitted to continue for an eUICC migration to India local profile.

- Further it is recommended that the timeline of three years should apply only for the new device and not on existing devices. Existing devices may be permitted to continue with roaming profile, as the migrations will be a complex task for all the operators, End user and M2MSPs.

In view of above submissions, it is requested that permanent international roaming should also be allowed through global 901.xx IMSI series for use in IoT/M2M applications by M2MSPs (NOC Holder). There are several global players (m2m and IoT service providers) like Aeris, Cubic Telecom, Twilio, Truphone are using 901.xx IMSI series. Please refer the **Appendix-1** containing the locations globally having 901.xx series permitted for IoT/M2M deployments and allowed permanent roaming. Therefore, this global series should be continued, to be allowed for use in India, as this will provide enhanced flexibility to the end users and will help in meeting global requirements where the devices and users would be moving across the borders thus enabling this IMSI series will significantly facilitate seamless mobility.

Appendix-1: List of countries having 901.xx series permitted for IoT/M2M deployments

Locations where currently permanent roaming is allowed incl. use of 901 range	Locations where direct roaming with a local carrier is allowed	Locations where only a local profile* is allowed
Albania	Angola	Brazil
Algeria	Georgia	China
Andorra	Indonesia	Egypt
Argentina	Macedonia	Iran
Armenia	Malaysia	Morocco
Australia	Myanmar	Nigeria
Austria	Tanzania	Saudi Arabia
Azerbaijan		Russia
Bahrain		UAE
Belarus		
Belgium		
Bolivia		
Bosnia and Herzegovina		
Botswana		
Brunei		
Bulgaria		
Cambodia		
Canada		
Chile		
Colombia		
Costa Rica		
Croatia		
Cyprus		
Czech Republic		
Denmark		
Dominican Republic		
Ecuador		
Estonia		
Falkland Islands		
Denmark		
Faroe Islands		
Finland		
France		
Germany		
Ghana		
Gibraltar		
Greece		
Greenland		
Guadeloupe		
Guam		
Guatemala		
Honduras		
Hong Kong		
Hungary		

Iraq		
Ireland		
Italy		
Ivory Coast		
Jamaica		
Japan		
Jordan		
Kazakhstan		
Kenya		
Kuwait		
Laos		
Latvia		
Lebanon		
Liechtenstein		
Lithuania		
Luxembourg		
Macau		
Malta		
Martinique		
Mauritius		
Mexico		
Moldova		
Monaco		
Mongolia		
Montenegro		
Mozambique		
Namibia		
Netherlands		
New Caledonia		
New Zealand		
Nicaragua		
Norway		
Oman		
Pakistan		
Panama		
Paraguay		
Peru		
Philippines		
Poland		
Portugal		
Puerto Rico (US)		
Qatar		
Reunion		
Romania		
Senegal		
Serbia		
Singapore		
Slovakia		
Slovenia		
South Africa		
South Korea		
Spain		

Sri Lanka		
Sweden		
Switzerland		
Taiwan		
Tenerife		
Thailand		
Trinidad & Tobago		
Tunisia		
UK		
Uruguay		
USA		
Vietnam		
Yemen		
Zambia		
Zimbabwe		

Note: *several local profile locations have allowed roam on 901 series as an exception.