To,
Telecom Regulatory Authority of India
New Delhi

Subject: *Comments on TRAI consultation paper No. 09/2022*

Dear Sir,
Rapidly growing multilayered digital ecosystem in India, comprising connected infrastructure, devices and applications is complex may create the security challenges and threats to the M2M/ IoT products, services, including enterprises and individuals.

To secure entire ecosystem from Product Development until the secure delivery is the major concern. IDEMIA is motivated and working on the same objectives, completely aligned with you.

Please find here our inputs as an attachment along with this letter.

Attachment
1.   The comments by IDEMIA on Consultation paper 09/2022 of TRAI

With Thanks & Best Regards

Pranav SINGH
Consultant
Standard & Specifivations CESE
Global R&D | NOIDA

M. +91-95 828 17930
WhatsApp +91 70 1177 8659
E. pranav.singh2@idemia.com

A1, Sector 73, Noida
Uttar Pradesh, India

IDEMIA

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www.idemia.com

The comments

On

Consultation Paper no 09/2022, published by TRAI

For

Embedded SIM for M2M Communications

IDEMIA
A-1, IDEMIA Tower, Sector 73, NOIDA

IDEMIA

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IDEMIA

Comments on TRAI consultation paper No. 09/2022

Sr. No	Chapter	Page	Clause	Original text as in the consultation paper	Comments	New text including comments are proposed as part of original text	Notes
1	2	31	2.13	Q1	Roaming grace period shall be allowed not more than a year, as the technology is mature enough in India		
2	2	32	2.14	Q2	SM-SR Swap shall be mandatory before completion of Roaming grace period. This would be based on GSMA Global standards (by managing ES3, ES5 and ES7 protocols in GSMA RSP architecture).		SM-SR swap is required as per the guidelines of GSMA. if Swapping is not done, it is security thread to all end_point devices, which are deployed in various use case such as power grid and many more such use cases.
3	2	32	2.15	Q3	It shall be done based on GSMA Specification for SM-SR interconnect and time period to implement, shall be under 6 months.		SM-SR integration shall be mandatory to avoid monopolize the business. It is just like a MNP in consumer business. That not only provide the flexibility in the business even more transparency. The connectivity is well defined by GSMA. As all TSP in India is well prepared so time period 6 month is enough to go for integration

4	2	33	2.16	Q4	GSMA has already defined the SM-SR swapping standards. OEM should be allowed to opt diffident SM-SR, further for this requirement SM_SR swapping would occur within country. this would create transparency and flexibility in the business		
5	2	33	2.17	Q5	Whole eSIM echo-system is led my OEM. End-user is really has no control if they are not satisfy with TSP service. In this case, Connectivity platform can solve this issue. The end-users can subscribe the platform services and can change TSP as their choice.		There is need to establish Connectivity Platform may be under M2MSP or any third party established with in India can solve this this business hassles. In this process subscriber would be insured with seem-less connectivity and OEM connected with this platform also would be relaxed for their OEM business revenue and even connectivity management. This connectivity platform may we call as Mobile Virtual Network Operator (MVNO) or Mobile Virtual Network Enabler (MVNE).

6	2	35	2.24	Q7	Global IMSI may be security thread to the country. Question ar 1. Where the KYC is managed. 2. Machine KYC is also required for this global IMSI. 3. The serving TSP has to take over responsibility if any security thread occurs by the subscriber or data tunnelling to foreign. Enabling of Global Security shall be discussed in security working group platform		**Security Challenges** 1. To define new terminology instead of Roaming. 2. What should be policy if Machine is with 901 IMSI, and now permanently in country. 3. KYC challenges. 4. Policy if any TSP/M2MSP facilitating the 901 IMSI.
7	3	45		Q1	Roaming shall be less than one year as the technology is well mature in India		
8	3	45		Q2	Before completion of roaming grace period SM-SR swap is mandatory with India		
9	3	45		Q3	Interconnection of SM-SR can be done as GSMA specification, the time period should be within 6 month		
10	3	45		Q4	SM-SR swap either from Foreign or with India shall be enabled as GSMA standard by managing ES3, ES5, ES7 protocols		
11	3	45		Q5	Connectivity platform under M2MSP or MVNO can solve this and provide more power to end_user. This should be either can be done using SM-SR or using 3GPP OTA services		

12	3	45		Q6	OEM is the leader of this business. They can have their own SM-SR to control their devices. GSMA standard are well defined for SM-SR business case for OEM and others		
13	3	46		Q7	Use of Global IMSI may a security thread for India. We have to discuss their repercussions in a security-working group. **Security Challenges** 1. To define new terminology instead of Roaming. 2. What should be policy if Machine is with 901 IMSI, and now permanently in country. 3. KYC challenges 4. Policy if any TSP/M2MSP facilitating the 901 IMSI.		