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भारत संचार निगम लिमिटेड  
(भारत सरकार का उपक्रम)  
BHARAT SANCHAR NIGAM LIMITED  
(A Govt. of India Enterprise)

To,  
Advisor (Networks, Spectrum and Licensing)  
Mahanagar Doorsanchar Bhawan  
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BSNLCO-RGLN/25/4/2022-REGLN dated ~~13-09-2022~~ <sup>19-09-2022</sup>

**Sub:** Comments on Consultation Paper on Embedded SIM for M2M Communications dated 25-07-2022

In reference to Consultation Paper on Embedded SIM for M2M Communications dated 25-07-2022, the comments of BSNL are as below,

**Q1.** 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?

**BSNL Reply:** Period may be reviewed after implementation of full interoperability of SM-DP & SM-SR. However proper implementation methodology used to be specified.

**Q2.** Whether there is a need to change the controlling SM-SR from foreign 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?

**BSNL Reply:** As per GSMA CLP.05-v1.0-BPD (Business Process for Remote SIM Provisioning in M2M) document, in order for compatibility to be achieved all vending parties respective SM-SRs and SM-DPs have to be interoperable with each other. Two GSMA subscription management specification features allow this i.e.

- SM\_SR switch process (SM-SR swap) in which a given SM\_SR linked with an eUICC can be replaced with another one and
- Profile Interoperability where any profile coming from any SM\_DP could be downloaded to an eUICC via its linked SM\_SR via various mechanisms.

Based on GSMA Embedded SIM Technical Specification V2.0, until full interoperability is achieved SM-DP and eUICC need to be linked with from the same vendor in order for a profile swap to work in the manner described currently.

In international in-roaming scenario where foreign eUICC fitted devices operating in Indian region and controlling SM-SR is in foreign boundaries, change of controlling SM-SR from foreign TSP to Indian TSP may be considered to counter security and privacy

concerns arises due to sharing of sensitive data such as device location etc. with foreign SM-SR.

Methodologies may be used as defined in GSMA CLP.05-v1.0-BPD (Business Process for Remote SIM Provisioning in M2M) document.

**Q3.** Whether there is a need for the SM-SR of each TSP to be integrated with the SM-DP of each other TSP? If yes, what should be the methodology for integration? Please specify the timelines also.

**BSNL Reply:** Refer Answer - 2 above.

**Q4.** 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 swap?

**BSNL Reply:** Yes; Methodologies may be used as defined in GSMA CLP.05-v1.0-BPD (Business Process for Remote SIM Provisioning in M2M) document. Also Refer Answer - 2 above.

**Q5.** 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?

**BSNL Reply:** Methodologies may be used as defined in GSMA CLP.05-v1.0-BPD (Business Process for Remote SIM Provisioning in M2M) document. As per document OEM will initiate the process.

**Q6.** Whether non-TSP entities, such as OEMs and M2M Service Providers, should be permitted to own SM-SR and manage the subscribed profiles for their devices? If yes, what should be methodology and procedure?

**BSNL Reply:** Yes, Methodologies may be used as defined in GSMA CLP.05-v1.0-BPD (Business Process for Remote SIM Provisioning in M2M) document.

**Q7.** 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.

**BSNL Reply:** Yes, However methodology/procedure may be suggested only after performing POC on possible test cases.

**Q8.** 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.

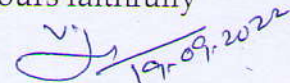
**BSNL Reply:** No comments.

Q9. Give your comments on any related matter that is not covered in this Consultation Paper.

**BSNL Reply:** No comments.

This is for your reference and n/a please.

Yours faithfully



19.09.2022

(Ved Prakash Verma)

DGM (Regulation-II)

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