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Syniverse Response to Consultation Paper on Transfer of Ownership of M2M SIMS

Submitted 17 August 2024.

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1 Introduction

Syniverse thanks the Telecom Regulatory Authority of India ("TRAI" or "the Authority") for the opportunity to make known Syniverse's comments on the Authority's consultation paper on the Transfer of Ownership of M2M SIMS published 24.06.2024.

Our comments do not address every single issue raised by TRAI in the Consultation Paper, but we do address the salient points related to Syniverse and our role in Mobile Number Portability ("MNP") especially but also in other key aspects. As such, in our response, if Syniverse has no opinion or comment on a consultation question we simply marked it as "No comment" following the description of the Issue for Consultation.

We look forward to continuing to work with the Authority and the Telecommunication Service Providers ("TSPs") in India for the betterment of the MNP and other key processes where Syniverse plays a part.

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2 Issues for Consultation

2.1 **Q1. Whether there is a need for a broad guiding framework for defining a service as critical M2M/ IoT service? If yes, what should be the guiding framework? Please provide a detailed response with justifications**

Syniverse Response: No comment.

2.2 **Q2. Through the recommendation No. 5.1(g) of the TRAI's recommendations on 'Spectrum, Roaming and QoS related requirements in Machine-to-Machine (M2M) Communications' dated 05.09.2017, TRAI had recommended that critical services in the M2M sector should be mandated to be provided only by connectivity providers using licensed spectrum. Whether this recommendation requires a review? Specifically, whether critical services in the M2M sector should be permitted to be provided by using unlicensed spectrum as well? Please provide a detailed response with justifications.**

Syniverse Response: No comment.

2.3 **Q3. Whether there is a need to bring M2M devices under the Trusted Source/ Trusted Product framework? If yes, which of the following devices should be brought under the Trusted Source/ Trusted Product framework:**

(a) All M2M devices to be used in India; or

(b) All M2M devices to be used for critical IoT/ M2M services in India; or

(c) Any other (please specify)?

Please provide a detailed response with justifications.

Syniverse Response: Yes, M2M devices should be under the Trusted Source/Trusted Product framework. Public sector (utilities, traffic, security, etc.) should be under a regulatory framework for added security. The non-public sector M2M devices (i.e., home automation and management, automobiles, consumer electronics, etc.) using unlicensed spectrum should be under much lighter regulatory control if at all. This will let the market determine how to proceed free from encumbrance of government regulations.

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2.4 Q4. Whether there is a need for establishing a regulatory framework for the transfer of ownership of M2M SIMs among M2MSPs? If yes,

(a) What should be the saliant features of such a framework?

(b) In which scenarios, the transfer of ownership of M2M SIMs should be permitted?

(c) What measures should be taken to avoid any misuse of this facility?

(d) What flexibility should be given to a new M2MSP for providing connectivity to the existing customers?

Please provide a detailed response with justifications.

Syniverse Response: Transfers can happen in two broad categories. First the ownership of the device can transfer. For example, an equipment may have an M2M device for reporting its status to some application and database and then the equipment may be sold. The new owner may prefer to use a different network or protocol for transferring that equipment data. This can happen as a regular port if the device in the equipment is using traditional wireless data and will continue to use wireless data. For this, the individual owner (i.e., the owner of the equipment) is responsible for migration of the data service so we do not see a strong need for this to follow any tracking or control of the ownership. The new owner may not even want to use the service and will ignore this feature. Therefore, this may not need to follow any kind of porting-like service. Especially when considering that many (if not most) M2M devices report data primarily. In other words, calls to the number programmed into the M2M SIM are rare.

The second category of transfers we envision is that the owner of multiple device networks (e.g., a utility with a large number of M2M SIMSs in place to record power consumption in real-time) may decide to switch from one wireless data service provider to another wireless data service provider for their entire inventory of mobile data devices using SIMs in a M2M environment. In this case, they may transfer hundreds, or thousands or more devices all at once (or in multiple large batches). In both cases of a switch from one mobile data service provider to another can be accomplished via a process similar to porting. This would provide a record of the transfer and a proven, reliable process for processing the transfer. A process like the current corporate port could work where the "owner" of the devices must approve the transfer in writing.

Some changes would be needed to set up a parallel process for coordinating and transferring the ownership of these M2M SIMs. First, the current MNP service providers are set up for a 10-digit phone number, but M2M SIMS may use a 13-digit number. Thus, the database may need some changes. The details of the process may also be changed and some aspects of the current MNP process would not be applicable (e.g., account suspension in the case of roaming fees arriving after the port for roaming just before the port took place).

2.5   **Q5. What are the other possible options, if any, to address the currently envisaged constraints in TI resources for fixed lines in an efficient manner? Please provide your answers with a detailed proposition (including technical challenges, changes required in handling, routing, interconnection and termination of emergency services and other essential calls and associated cost/benefit analysis). Supportive documents, if any, may also be provided to justify your answer.**

Syniverse Response: No comment.

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3 Other Comments

Syniverse Response: Syniverse recommends a centralised database/registry of all SIMs with ownership details, not just restricted to M2M devices setup to track legitimate owner, but also to facilitate recorded legitimate ownership changes under a defined framework to track ownership. Such Centralized Database can be utilised to extend to meet needs of LEAs. Further this registry can be integrated with CNAP services.

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4 About Syniverse

Syniverse is the world's most connected company. We seamlessly connect the world's networks, devices, and people, so the world can unlock the full power of communications.

Our secure, global technology powers the world's leading carriers, top Forbes Global 2000 companies, and billions of people, devices, and transactions every day. Our engagement platform delivers better, smarter experiences that strengthen relationships between businesses, customers, and employees.

For over 30 years, we have accelerated important advances in communications technology. Today we are an essential driver of the world's adoption of intelligent connectivity, from 5G and CPaaS to IoT and beyond. Find out more www.syniverse.com.