

No. 4-31/M2M Critical Services/2019-NT
Government of India
Ministry of Communications
Department of Telecommunications
(Networks and Technologies Division)

Dated: 28.10.2025

Office Memorandum

Subject: Framework for Transfer of M2M SIM Ownership between M2M Service Providers (M2M SPs)/Licensees -reg.

In reference to the Telecom Regulatory Authority of India (TRAI) recommendations dated 22nd April 2025 on "Issues Related to Critical Services in the M2M Sector and the Transfer of Ownership of M2M SIMs", which have been by and large accepted by the Government, approval of competent authority is hereby conveyed in respect of the procedure for the transfer of ownership of M2M SIMs between M2M Service Providers/Licensees as below:

2. Procedure for Transfer of Ownership of M2M SIMs

2.1. Initiation by M2M Service User/Third Party: The third party to whom M2M SP/Licensee is providing M2M Services shall initiate the transfer process by submitting a formal written request (format at Annexure A.1) to the existing M2M SP/Licensee (hereinafter 'transferor'), specifying details of the SIMs sought to be transferred and the intended transferee M2M SP/Licensee (hereinafter 'transferee').

2.2. No Objection Certificate by Transferor: On receipt of the user's request, the transferor shall, within 15 days, issue a No Objection Certificate (format at Annexure A.2) to the concerned Access Service Provider(s), subject to no dues pending from the M2M Service user, confirming the user's request and specifying the SIMs for transfer.

2.3. Undertaking by Transferee: The transferee shall submit a formal undertaking (format at Annexure A.3), addressed to the Access Service Provider(s), thereby accepting all responsibilities and liabilities pertaining to the transferred SIMs, inclusive of compliance with all KYC and related guidelines. The transferee shall also maintain, and provide on request, updated details of the physical custodians of such devices fitted with M2M SIMs obtained from the transferor entity.

2.4. Verification, KYC and update by Access Service Provider (ASP): The Access Service Provider(s) shall verify both the NOC from the transferor and the undertaking from the transferee. Upon successful verification, the provider(s) shall carry out KYC again and update the subscriber records to reflect the change in ownership. At all times, each M2M SIM shall remain mapped to an M2M SP/Licensee, and there shall be no discontinuation of M2M service to the user.

Annexures:

A.1 – Application format by M2M Service User/Third Party

- A.2 – NOC format by Transferor
- A.3 – Undertaking format by Transferee

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To:

1. All M2M Service Providers
2. All CMTS/UAS/UL Licensees

Copy To:

1. PSO To Secretary(T)
2. PSO to Member(T)
3. Secretary (TRAI)
4. DG (T)
5. Heads of DoT LSA units
6. DDG-LP, DDG-AS, DDG-SA, DDG(AI&DIU), DDG(Media)

Annexure A.1: Sample User-Initiated Request Format for M2M SIM Transfer

(To be submitted by M2M Service User/Third party to Transferor)

To,
The Nodal Officer (M2M Services)
M/s [Name of Transferor]
[Address of Transferor]
Date: [Date]

Subject: Request for Transfer of Ownership of M2M SIMs

Dear Sir/Madam,

This is to formally request the transfer of ownership of the M2M SIMs currently registered under your M2MSP Registration No./License no. [Transferor M2M SP Registration No./License no.], which are being utilized in M2M/IoT devices under our control.

Due to [brief reason for transfer, e.g., change in M2M service provider, internal restructuring, strategic decision], we wish to transfer the ownership of the following M2M SIMs to M/s [Name of Transferee], having M2MSP Registration No./License no. [Transferee M2MSP Registration No./License no.]. The details of the M2M SIMs and associated devices for which ownership transfer is requested are attached herewith.

We confirm that we are the legitimate users of the aforementioned M2M SIMs fitted in M2M/IoT devices and that this request is initiated by our authorized representative. We understand that M/s [Name of Transferee] will assume all responsibilities for these M2M SIMs and its compliance to DoT thereof.

We kindly request you to facilitate this transfer by issuing the necessary No Objection Certificate (NOC) to the concerned Access Service Provider(s) and assisting in the smooth transition of services.

[Signature]

[Name and Designation of Authorized Signatory]

M/s [Name of Third Party/User Entity]

Enclosure:

S. No.	MSISDN (Mobile Number)	IMSI	M2M/IoT Device Type (e.g., POS Machine, GPS Tracker, Smart Meter)	M2M/IoT Device IMEI (if applicable)

Annexure A.2: Sample No Objection Certificate (NOC) Format for M2M SIM Transfer

(To be issued by Transferor to concerned Access Service Provider)

[On the Letterhead of Transferor]

To,
The Nodal Officer (M2M Services)
[Name of Access Service Provider]
[Address of Access Service Provider]
Date: [Date]

Subject: No Objection Certificate for Transfer of M2M SIM Ownership

Dear Sir/Madam,

This is to certify that we, M/s [Name of Transferor], having M2M SP Registration No./License no. [Transferor M2MSP Registration No./License no.] are currently the registered owners of the M2M SIMs listed below, procured from your esteemed organization.

We confirm that we have received a formal, user-initiated request from M/s [Name of Third Party/M2M Service User Entity], for the transfer of ownership of these specific M2M SIMs to another M2M Service Provider/Licensee, M/s [Name of Transferee], having M2MSP Registration No./License no. [Transferee M2MSP Registration No./License no.]. (A copy of the user-initiated request is attached for your reference).

We hereby grant our explicit No Objection for the transfer of ownership of the attached M2M SIMs from our registration to M/s [Name of Transferee] in your subscriber database.

We confirm that all outstanding dues related to these SIMs up to the date of this NOC have been cleared or will be settled as per our agreement with you. We understand that upon verification of this NOC and the undertaking from the transferee, you will update your records to reflect M/s [Name of Transferee] as the new owner of the aforementioned SIMs without deactivating or re-activating them.

[Signature]

[Name and Designation] of Authorized Signatory]

M/s [Name of Transferor]

Enclosure:

S. No.	MSISDN (Mobile Number)	IMSI	M2M/IoT Device Type (e.g., POS Machine, GPS Tracker, Smart Meter)	M2M/IoT Device IMEI (if applicable)

Annexure A.3: Sample Undertaking/Declaration Format for Transferee)
(To be submitted by Transferee to Concerned Access Service Provider)

[On the Letterhead of Transferee]

UNDERTAKING / DECLARATION

I/We, [Name of Authorized Signatory], Son/Daughter of [Father's Name], residing at [Residential Address], and acting in my capacity as [Designation] of M/s [Name of Transferee], having M2MSP Registration No./License no.[Transferee M2MSP Registration No./License no.] and registered office at [Registered Office Address], do hereby solemnly affirm and declare as under:

1. That M/s [Name of Transferee] is a duly registered M2M Service Provider/Licensee with the Department of Telecommunications.

2. That this undertaking pertains to the transfer of ownership of M2M SIMs from M/s [Name of Transferor] with M2MSP Registration No./License no. [Transferor M2MSP Registration No./License no.] to M/s [Name of Transferee] with M2MSP Registration No./License no. [Transferee M2MSP Registration No./License no.], based on a user-initiated request.

3 . **That M/s [Name of Transferee] hereby unconditionally and irrevocably agrees to take over and assume all responsibilities, obligations, liabilities, and duties pertaining to all M2M SIMs specified for transfer from M/s [Name of Transferor](List enclosed).**

4. That we shall make available all required information and records related to these transferred M2M SIMs and details of physical custodians of M2M/IoT Devices fitted with these M2M SIMs to the concerned Access Service Provider(s) and the Department of Telecommunications as and when required.

5. That we shall indemnify and keep indemnified the Department of Telecommunications and the Access Service Provider(s) from any loss, damage, claims, or liabilities arising out of or in connection with the operation, transfer, or non-compliance related to the said M2M SIMs after the effective date of transfer.

We make this undertaking/declaration solemnly believing the same to be true and correct.

[Signature]
[Name of Authorized Signatory]
[Designation]

M/s [Name of Transferee]
Date:
Place:

Enclosure:

S. No.	MSISDN (Mobile Number)	IMSI	M2M/IoT Device Type (e.g., POS Machine, GPS Tracker, Smart Meter)	M2M/IoT Device IMEI (if applicable)