

Knowledge Management

Semi-Annual Telecommunications Compendium 2025

July – December 2025



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Introduction

This Compendium consolidates all the key developments undertaken in the telecommunications sector which were circulated as JSA Newsletters/Prisms during the calendar period from July 2025 till December 2025.

Regulatory updates

Telecom Regulatory Authority of India response to the back reference received from Department of Telecommunications on its earlier recommendations for additional spectrum for Indian Railways' safety and security applications

On July 4, 2025, the Telecom Regulatory Authority of India ("TRAI") issued its Responses ("Responses") to the back reference sent by Department of Telecommunications ("DoT") on TRAI's earlier Recommendations on 'Assignment of Additional Spectrum to Indian Railways for its Safety and Security Applications' dated December 20, 2024 ("Previous Recommendations"). The Responses to the Previous Recommendations broadly state the following:

1. TRAI under the Previous Recommendations put forth the aspects related to sharing of spectrum among Indian Railways/National Capital Region Transport Corporation("NCRTC")/Regional Rapid Transit System ("RRTS")/metro rail and other similar networks. It also addressed spectrum valuation and charging methodology along with the various issues related to assignment of additional 5 MHz (paired) spectrum in the 700 MHz band to Indian Railways. TRAI reiterated its earlier position rejecting DoT's view that additional spectrum in the 700 MHz band should be assigned only after the currently assigned 5 MHz (paired) spectrum is fully utilised. TRAI further clarified that any new assignment will be based on the Auction Determined Price ("ADP") and will require upfront payment of spectrum charges. TRAI is of the view that an additional 5 MHz of paired spectrum can be assigned to Indian Railways so that they can plan, design and implement an optimised network for meeting the bandwidth requirements;
2. TRAI under the Previous Recommendations put forth that the field trial of radio access network sharing through multi-operator core network is conducted and in the event the Indian Railways intends to use the 5 MHz frequency spectrum in the

700 MHz band assigned to NCRCTC and other RRTS/metro rail networks, then the Indian Railways will be permitted to use the additional 5 MHz spectrum on an additional payment basis provided the same is not being used by NCRTC/other RRTS/metro rail networks. TRAI reiterated its earlier position rejecting DoT's view that since Indian Railways is yet to utilise the already assigned 5 MHz of paired spectrum in the 700 MHz, the recommendation by TRAI may not be considered. TRAI is of the view that where the 5 MHz frequency spectrum is not being used by NCRTC/other RRTS/metro rail networks, it should be allowed to Indian Railways keeping the national interest in mind; and

3. TRAI under the Previous Recommendations put forth the recommendation that spectrum charges for Indian Railways/NCRTC/other RRTS/metro rail networks should be levied based on the formula for royalty charges and license fees for captive use. TRAI further recommended that in order to harmonise the administrative assignment of spectrum in the International Mobile Telecommunications ("IMT") bands, it should adopt an upfront payment mechanism based on the annual demand projections. This new charging method will apply to all future administrative assignments of IMT band spectrum. This approach is expected to promote efficient spectrum utilisation, prevent hoarding or blocking of spectrum, and resolve accounting issues that arise from phased spectrum assignments. This upfront ADP payment mechanism will also be applied to the 5 MHz of paired spectrum already assigned to Indian Railways, effective prospectively. TRAI reiterated its earlier position rejecting DoT's view that such charging mechanism will enthuse efficiency in utilisation of spectrum by the user department, avoid hoarding/blocking of spectrum and avoid accounting problem due to assignment of spectrum in phased manner. This upfront payment of ADP mechanism will also be applicable to the already assigned 5 MHz of paired spectrum to the Indian Railways with prospective effect. TRAI is of the view that DoTs concern regarding hoarding or blocking of spectrum and accounting related challenges do not appear to be well founded.



Joint Committee of Regulators

On July 22, 2025, TRAI convened a meeting of the Joint Committee of Regulators ("JCoR"), which was attended by the representatives of Reserve Bank of India ("RBI"), the Securities Exchange Board of India ("SEBI"), the Insurance Regulatory Development Authority of India ("IRDAI"), the Pension Fund Regulatory and Development Authority ("PFRDA"), the Ministry of Electronics and Information Technology ("MeitY"), DoT, the Ministry of Home Affairs ("MHA") and the National Payments Corporation of India ("NPCI"), to roll out collaborative regulatory measures in light of rising digital payment linked frauds. Some of the key outcomes are as follows:

1. regulators agreed on a phased migration to the 1600-number series for banking, financial services and insurance service calls, with timelines based on inputs from sectoral regulators to TRAI;
2. a pilot project is underway, led by TRAI and RBI, aimed to replace offline consents with a secure digital system for managing consent for commercial communication. Major banks and telecom providers will participate, with 4 (four) working groups to oversee the implementation. A workshop on July 21, 2025, confirmed joint commitment to the initiative;
3. plans were discussed for automated data sharing between Indian Cyber Crime Coordination Centre, DoT, and Distributed Ledger Technology platforms under the Telecom Commercial Communications Customer Preference Regulations, 2018, to enable quick actions like disconnection of fraud-related numbers;

4. misuse of Session Initiation Protocol and Primary Rate Interface lines for spam was flagged and proposed solutions include issuing lines from designated ranges and adding safeguards;
5. TRAI updated its portal to help users identify entities behind commercial SMS headers; and
6. NPCI was added to JCoR to address mobile and unified payments interface-related financial fraud, strengthening the committee's fraud prevention efforts.

Further, TRAI emphasised the need for cross-sectoral collaboration to protect consumers in a digital economy, and urged regulators to implement safeguards swiftly without burdening legitimate businesses.

Thereafter, on October 16, 2025, TRAI convened the 9th meeting of the JCoR attended by representatives from RBI, SEBI, PFRDA, MeitY, DoT, MHA, Ministry of Consumer Affairs, and NPCI, along with industry stakeholders including Google, Meta, GSMA, and Cellular Operators Association of India. The discussions focused on collaborative efforts to combat spam and cyber fraud and to strengthen consumer protection in digital communications. The key outcomes of the meeting were as follows:

1. the committee agreed to complete the ongoing pilot project for Digital Consent Acquisition ("DCA") by February 2026, with defined milestones;
2. a phased migration to the 1600-series numbering plan for the Banking, Financial Services, and Insurance ("BFSI") sector was approved, with sectoral regulators supporting the timeline;
3. TRAI will issue directions regarding differential treatment for small scale financial and business entities under the 1600-series mandate;
4. mandatory whitelisting of URLs, OTT links, APKs, and callback numbers in SMSes was emphasised to prevent misuse. TRAI highlighted its ongoing efforts and received full support from stakeholders';
5. TRAI and Telecom Service Providers ("TSPs") may publish lists of blacklisted entities involved in spamming to deter such activities; and
6. the committee supported TRAI's draft direction on enhanced principal entity and security, including

real time credential validation and CAPTCHA for one-time-password systems.



TRAI response to the back reference received from DoT on TRAI's recommendations on the terms and conditions of network authorisations to be granted under the Telecommunications Act, 2023

On August 13, 2025, TRAI issued its responses to the back reference sent by DoT on TRAI's earlier Recommendations on 'Terms and Conditions of Network Authorisations to be Granted Under the Telecommunications Act, 2023' dated February 17, 2025 ("Previous T&C Recommendations"). The responses to the Previous T&C Recommendations broadly state the following:

1. the Previous T&C Recommendations stated that the Central Government should seek TRAI's input on any substantive changes to the terms and conditions of network authorisations. DoT had responded that this might not be accepted. In the responses, TRAI reiterated its position, clarifying that its recommendation only applies to substantive changes, not routine amendments, to ensure regulatory stability and investor confidence;
2. the Previous T&C Recommendations sought to prevent entities from holding multiple authorisations with overlapping scopes. DoT had responded by proposing a new provision to exclude entities with existing, overlapping service authorisations from being eligible for new network authorisations. TRAI in its responses accepted this proposed provision as it aligns with their original objective;
3. the Previous T&C Recommendations did not address Satellite Communication Network ("SCN") authorisation under the new Telecommunications Act, 2023 ("Telecom Act"). DoT had referred this

issue to TRAI. TRAI responded by announcing a new consultation process to get stakeholder views on the terms and conditions for SCN authorisation, including spectrum assignment. On the issue of Internet Exchange Points ("IXP") blocking internet sites, DoT had sought TRAI's views on the technical feasibility. TRAI responded by noting that the feasibility depends on whether the IXP operates at Layer 2 or Layer 3 and recommended that DoT, in consultation with the MHA and Telecommunication Engineering Centre ("TEC"), examine the need and feasibility of such blocking;

4. the Previous T&C Recommendations exempted the establishment of In-Building Solutions ("IBS") by property managers from authorisation, to encourage deployment and address poor network coverage. DoT had responded by suggesting that IBS should be part of the 'Infrastructure Provider Authorisation'. TRAI reiterated its original recommendation, arguing that the exemption would help prioritise the deployment of IBS in buildings and reaffirmed that property managers must provide fair and non-discriminatory access to all authorised TSPs and digital connectivity infrastructure provider entities;
5. the Previous T&C Recommendations advised against a separate licensing framework for Content Delivery Network ("CDN") providers to support market expansion. DoT had requested a reconsideration of this. TRAI confirmed its previous recommendation and, instead of licensing, proposed a mandate for agreements between the authorised telecommunications entities and CDN providers to be fair, non-discriminatory, and compliant with net neutrality objectives; and
6. the Previous T&C Recommendations proposed a single bank guarantee to promote ease of doing business and cover all financial obligations. DoT had not provided a reason for accepting this, only for the Central Government and not for TRAI. TRAI reiterated its recommendation and proposed that if the single bank guarantee is not accepted, a separate one should be stipulated with TRAI to secure the recovery of financial disincentives.



Recommendations on reserve price for auction of Frequency Modulation Radio Channels, 2025

On September 23, 2025, TRAI issued recommendations on the reserve price for auction of Frequency Modulation ("FM") radio channels. These recommendations were made in response to a reference from the Ministry of Information and Broadcasting ("MIB") seeking reserve prices for FM channels in 3 (three) cities i.e. Bilaspur (Chhattisgarh), Rourkela (Odisha), and Rudrapur (Uttarakhand), as well as for 18 (eighteen) new cities in hilly States and Union Territories proposed to be classified under a newly introduced city category 'E'.

TRAI recommended that the reserve prices for Bilaspur, Rourkela, and Rudrapur be set at 70% of the average valuation derived from 4 (four) key variables namely per capita gross state domestic product; per capita gross revenue; FM radio listenership; and past ADP. The valuation methodology was consistent with TRAI's 2020 recommendations, with adjustments made using the 'Market Intensity Index' to reflect city-specific market potential. Accordingly, the reserve prices recommended were INR 83,00,000 (Indian Rupees eighty-three lakh) for Bilaspur, INR 1,20,00,000 (Indian Rupees one crore twenty lakh) for Rourkela, and INR 97,00,000 (Indian Rupees ninety-seven lakh) for Rudrapur.

For the newly proposed category 'E' cities, TRAI recommended a reserve price of INR 3,75,000 (Indian Rupees three lakh seventy-five thousand) per channel. This was calculated by applying a coverage ratio of 0.75 (zero point seven five) to INR 5,00,000 (Indian Rupees five lakh) reserve price used for cities in the 'Others'

category during the Phase-III auctions. The lower 'Effective Radiated Power' and reduced coverage area in category 'E' cities justified the reduced reserve price.

TRAI also recommended that the minimum net worth requirement for bidders in category 'E' cities be set at INR 30,00,000 (Indian Rupees thirty lakh), lower than the INR 50,00,000 (Indian Rupees fifty lakh) required for 'Others' category cities. This is intended to encourage participation from local entrepreneurs and reduce entry barriers. For all other city categories (A+, A, B, C, D, 'Others'), the existing financial competence criteria under the FM Phase-III policy guidelines dated July 25, 2011, would continue to apply.

Regarding annual fees, TRAI recommended that category 'E' cities be subject to an annual authorisation fee of 2% of the Adjusted Gross Revenue ("AGR") for the initial 3 (three) years, increasing to 4% thereafter. AGR should be calculated after excluding the Goods and Services Tax ("GST") from the gross revenue. Additionally, revenue from streaming of radio content should be included in the AGR. These recommendations align with TRAI's earlier proposals to delink annual fees from the 'Non-Refundable One Time Entry Fee', which have already been accepted for new cities but not yet extended to existing licensees.

TRAI proposed that the maximum number of FM channels in category 'E' cities be capped at 3 (three), consistent with the limit for category 'D' and 'Others' cities. For all other categories, the existing channel limits under the FM Phase-III policy would remain unchanged.

To support the financial viability of FM broadcasters, TRAI reiterated its earlier recommendations to remove the mandatory requirement for co-location on Prasar Bharati infrastructure. Instead, infrastructure sharing should be voluntary and based on technical and commercial feasibility. Additionally, *Prasar Bharati* should offer its land and tower infrastructure and common transmission infrastructure to private broadcasters at concessional rental rates, with full recovery of operational expenses.

TRAI also reaffirmed its recommendation that private FM broadcasters be permitted to air independent news and current affairs programs for up to 10 (ten) minutes per hour, subject to compliance with the program code prescribed by the Central Government. Furthermore, broadcasters should be allowed to stream their radio content concurrently over the internet without user

control features such as download or replay, thereby expanding reach and revenue potential.

Finally, TRAI recommended that successful bidders be given multiple payment options for the bid amount, similar to those offered in telecom spectrum auctions. These options include upfront payment or staggered instalments over 20 (twenty) years, with interest protection on net present value. This flexibility is expected to improve auction participation and reduce financial stress on FM operators.



Recommendations on method of allocation of spectrum for Public Mobile Radio Trunking Service including auction, as a transparent mechanism

On September 30, 2025, TRAI issued its formal response to the DoT back-reference dated July 21, 2025, regarding TRAI's earlier recommendations from July 20, 2018 on the 'Method of Allocation of Spectrum for Public Mobile Radio Trunking Service including auction as a transparent mechanism'. The response addressed reconsideration requests, clarified positions, and updated certain recommendations in light of technological and regulatory developments. The key points are as follows:

1. TRAI revised its earlier stance on the validity period of spectrum assignment for Public Mobile Radio Trunking Service ("PMRTS") and recommended a maximum validity of 5 (five) years, citing rapid technological evolution in critical communications. A review after 5 (five) years may allow renewal for another 5 (five) years, depending on ecosystem viability;
2. TRAI emphasised that spectrum assignment duration should be service specific. It does not support a blanket 5 (five) year limit for all services, as proposed by DoT, and calls for differentiated

treatment based on the nature and requirements of each service;

3. regarding royalty charges, TRAI had earlier proposed 2 (two) payment options namely annual payments and one-time upfront payment for 20 (twenty) years. In light of the revised 5 (five) year spectrum validity, TRAI now suggested that the one-time payment option be recalibrated on a pro-rata basis to reflect the shorter term;
4. TRAI concurred with DoT's view that the Spectrum Usage Charges ("SUC") for PMRTS should be levied at 1% of AGR. However, it withdrew its earlier recommendation to exclude handset sales revenue from AGR, aligning with recent regulatory reforms and the definition of Applicable Gross Revenue ("ApGR") under the Telecom Act;
5. TRAI reaffirmed that Public Protection and Disaster Relief ("PPDR") agencies in the 806-824/851-869 MHz band should be integrated into the Broadband PPDR network in the 814-824/859-869 MHz sub-band, freeing 806-811/851-856 MHz for PMRTS and Captive Mobile Radio Trunking Service on a justified basis;
6. despite these recommendations, TRAI notes that DoT had not incorporated the proposed changes into the National Frequency Allocation Plan ("NFAP") 2018 or 2022. DoT had instead opted to retain its existing band plan without providing reasons for rejecting TRAI's recommendations; and
7. without DoT's justification, TRAI could not reassess the case and reiterated its recommendation for a digital radio broadcasting policy with a clear rollout roadmap based on stakeholder consultation and global best practices for PPDR spectrum planning.



Recommendations on Formulating a Digital Radio Broadcast Policy for private broadcasters

On October 3, 2025, TRAI issued its Recommendations ("Recommendations") in response to MIB reference dated April 23, 2024. The Recommendations aim to facilitate the rollout of digital radio broadcasting services in India and address various regulatory, technical, and commercial aspects. They broadly state the following:

1. adoption of a single digital radio technology standard, either Digital Radio Mondiale or HD Radio, for nationwide deployment in the VHF Band II (88-108 MHz), to be selected by the Government in consultation with industry stakeholders;
2. that spectrum for new digital channels be auctioned in phases, starting with 13 (thirteen) A+/A category cities. The ADP will serve as the basis for migration fees for existing broadcasters;
3. that existing FM broadcasters may be allowed to voluntarily migrate to simulcast mode within 6 (six) months post auction. The migration fee will be the difference between the ADP and the proportionate non-refundable one time entry fee for the remaining license period;
4. introducing a new category of service provider as the Radio Broadcasting Infrastructure Provider ("RBIP") to facilitate active and passive infrastructure sharing. Participation as an RBIP would be optional and not a prerequisite for digital radio rollout;
5. that eligibility for digital radio broadcasting be extended to Indian companies and limited liability partnerships, with a minimum net worth of INR 30,00,000 (Indian Rupees thirty lakh) for service authorisation. City specific net worth thresholds for auction participation will follow FM Phase III policy;
6. defining Gross Revenue ("GR") to include all inflows from broadcasting activities, including streaming and barter contracts, and excluding GST and non-operational income such as dividends, interest, and Government reimbursements;
7. that ownership of spot frequencies be capped at 40% per entity per city, with a minimum of 3 (three) broadcasters per city. This restriction

applies to spot frequencies, not the number of channels operated;

8. that broadcasters comply with Programme and Advertising Codes, broadcast at least 50% Indian content, and provide 30 (thirty) minutes of public service programming daily;
9. allowing news and current affairs programming up to 10 (ten) minutes per hour, including unaltered All India Radio bulletins and live sports coverage; and
10. penalties for non-operationalisation of services within 24 (twenty-four) months of auction, including withdrawal of frequency and a 5 (five) year ban on re-entry in the same city. Channels closed for more than 180 (one hundred and eighty) days in a year may face revocation of authorisation.

Recommendations on introduction of Calling Name Presentation Service in Indian telecommunication network

TRAI issued its response to DoT's back-reference on TRAI's recommendations regarding the introduction of Calling Name Presentation ("CNAP") service in Indian telecommunication networks, *vide* notification dated October 28, 2025. DoT had initially requested TRAI's recommendations on the feasibility of introducing CNAP service, which allows the called party to view the name of the calling party. The recommendations broadly stated the following:

1. TRAI reaffirmed CNAP as a supplementary service with default availability and an opt-out option, while DoT accepted this with minor changes and agreed to amend the Unified License ("UL") to include calling name information;
2. TRAI proposed 2 (two) CNAP implementation models one where database queries for Circuit Switched ("CS") networks and signalling based transmission for Internet Protocol ("IP") networks, and DoT accepted both with phased rollout, prioritising 4G and above while deferring legacy networks;
3. TRAI recommended conducting a trial in one Licensed Service Area ("LSA") before pan India rollout. DoT confirmed successful trials for 4G and above technologies and agreed to defer trials for CS networks until technical feasibility was achieved;

4. TRAI suggested that CNAP capability be mandated in all devices sold in India after a suitable cut-off date. DoT accepted this recommendation and indicated that handset related matters would be coordinated with MeitY; and
5. TRAI responded by reaffirming CNAP's classification as a supplementary service, citing international standards from International Telecommunication Union ("ITU") and European Telecommunication Standards Institute, and reiterated its original recommendation. TRAI concluded that CNAP clearly qualified as a supplementary service and therefore reaffirmed its original recommendation to include CNAP as a supplementary service in telecom licenses.



TRAI directions regarding measures to curb misuse of headers and content templates under Telecom Commercial Communications Customer Preference Regulations, 2018

On November 18, 2025, TRAI issued a direction ("TCCCP Direction") under Section 13 of the TRAI Act, 1997 read with relevant provisions of the Telecom Commercial Communications Customer Preference Regulations, 2018 ("TCCCP") regarding measures to curb misuse of headers and content templates in commercial communications. The TCCCP Direction broadly stated the following:

1. TRAI observed that its February and May 2023 directions on limiting SMS template variables, pre-tagging, and using only whitelisted URLs, APKs, OTT links, and callback numbers have not been fully implemented despite industry consultations;
2. to address misuse and strengthen consumer protection, TRAI now directs access providers to

pre tag all SMS template variables with descriptive labels and validate them against whitelisted URLs, links, and numbers within 30 (thirty) days, with new templates complying in 10 (ten) days and existing ones in 60 (sixty) days;

3. for the first 60 (sixty) days, scrubbing will run in logger mode allowing message delivery despite validation failures, after which non-compliant messages will be rejected and principal entities notified of corrective actions; and
4. access providers must furnish fortnightly progress reports to TRAI and submit updated Codes of Practice within 90 (ninety) days of issuance of this TCCCP Direction. Annexure-I provides detailed tagging rules for variables such as numeric values, URLs, callback numbers, email addresses, and alphanumeric fields, along with validation and scrubbing requirements.



TRAI directions mandating phase-wise adoption of 1600-series by BFSI sector entities, regulated by RBI, SEBI and PFRDA

On November 19, 2025, TRAI issued a direction (“**BSFI Direction**”) mandating the phase-wise adoption of the ‘1600’ numbering series by entities in the BFSI sector regulated by the RBI, SEBI, and PFRDA. The BFSI Direction aims to enhance consumer trust, curb spam, and prevent fraudulent activities perpetrated through voice calls. The ‘1600’ numbering series, assigned by DoT, was intended to clearly distinguish service and transactional calls from regulated financial institutions and government organisations, enabling citizens to

reliably identify legitimate calls. The BSFI Direction broadly stated the following:

SEBI regulated entities

1. Mutual funds and asset management companies must complete adoption by February 15, 2026.
2. Qualified stockbrokers must complete adoption by March 15, 2026.
3. Other SEBI registered intermediaries may voluntarily migrate after verification of registration details.

RBI regulated entities

1. Commercial banks including public, private, and foreign banks must onboard by January 1, 2026.
2. Large non-banking financial companies with asset size above INR 5,000 crore (Indian Rupees five thousand crore), payments banks, and small finance banks must onboard by February 1, 2026.
3. Remaining non-banking financial companies, co-operative banks, regional rural banks, and smaller entities must onboard by March 1, 2026.

PFRDA regulated entities

1. Central record-keeping agencies and pension fund managers must onboard by February 15, 2026.
2. The timeline for insurance sector entities was under discussion with IRDAI and will be notified separately.
3. TRAI noted that approximately 485 (four hundred and eighty-five) entities have already adopted the 1600-series, subscribing to over 2800 (two thousand eight hundred) numbers. The structured and time-bound adoption of the 1600-series was expected to significantly improve consumer safety and curb impersonation-based financial frauds through voice calls.

TRAI responds to the back-reference received from DoT on TRAI's earlier recommendations regarding terms and conditions for the assignment of spectrum for certain satellite-based commercial communication services

On December 8, 2025, TRAI issued its response to the back reference received from DoT on TRAI's earlier recommendations dated May 9, 2025 regarding 'Terms and Conditions for the Assignment of Spectrum for Certain Satellite-Based Commercial Communication Services'. The response addresses DoT's observations and requests for reconsideration on specific recommendations. The key points are as follows:

- Frequency bands:** TRAI reaffirmed its recommendation to use Ku, Ka, and Q/V bands for NGSO-based FSS and L and S bands for MSS user links, with feeder links in C, Ku, Ka, and Q/V bands. DoT suggested including UHF bands for MSS and TRAI noted that UHF band encompasses L and S bands but advised DoT to examine its coverage under the Telecom Act.
- Spectrum coordination:** TRAI agreed to DoT's proposal for additional provisions requiring operators to enter into coordination agreements and acknowledged the Government's right to intervene in case of harmful interference.
- Spectrum pricing:** TRAI reiterated its framework:
 - NGSO-based FSS: 4% of AGR plus INR 500 (Indian Rupees five hundred) per urban subscriber annually (rural/remote exempted).
 - GSO/NGSO-based MSS: 4% of AGR.

TRAI rejected DoT's proposal for a flat 5% AGR charge with conditional discounts for hard-to-connect areas, citing the need to prioritise rural and remote regions to bridge the digital divide.

- Subsidy for terminals:** TRAI maintained its recommendation for government subsidies on NGSO user terminals in underserved rural and remote areas, suggesting implementation through the DBT or third-party implementers under Digital Bharat Nidhi schemes.
- Payment terms:** TRAI aligned AGR-linked payment schedules with draft authorisation rules but insisted on incorporating provisions for

minimum spectrum charges and per-subscriber charges in final rules.

- Policy rationale:** TRAI emphasised equitable access, affordability, and rapid deployment of satellite services to rural and remote areas. It highlighted NGSO's advantages, low latency, better coverage, and resilience and the need for pricing and incentives that prevent concentration of services in urban markets.



Recommendations on Assignment of the Microwave Spectrum in 6 GHz (lower), 7 GHz, 13 GHz, 15 GHz, 18 GHz, 21 GHz Bands, E-Band, and V-Band

On December 10, 2025, TRAI issued its recommendations on the 'Assignment of the Microwave Spectrum in 6 GHz (lower), 7 GHz, 13 GHz, 15 GHz, 18 GHz, 21 GHz Bands, E-Band, and V-Band'. These recommendations respond to DoT reference dated September 13, 2024, and aimed to establish a comprehensive policy framework for spectrum allocation for backhaul purposes under the Telecom Act. The recommendations were structured to address these issues in alignment with the provisions of the Telecom Act which mandates administrative assignment for radio backhaul spectrum. The key recommendations were as follows:

- Spectrum usage:** TRAI recommended reserving traditional microwave backhaul bands (6 GHz (lower), 7 GHz, 13 GHz, 15 GHz, 18 GHz, 21 GHz) exclusively for radio backhaul, not last-mile connectivity, to maintain the distinction between auctioned access spectrum and administratively assigned backhaul spectrum.
- Eligible entities:** Any authorised entity, including captive users, may obtain backhaul spectrum for self-use only, limited to interconnecting telecom equipment within the network and not customer devices.
- Carrier size and aggregation:** Standard carrier size remains 28 MHz paired, with contiguous assignments encouraged; assignees may aggregate

or split carriers without prior government approval for operational flexibility.

4. **Assignment methodology:** MWA bands (13 GHz, 15 GHz, and 18 GHz) will be block-assigned for wireless access backhaul; 21 GHz and 6 GHz lower bands will be link-based with carrier ceilings and minimum link lengths; no new link-based assignments in 13 GHz, 15 GHz, and 18 GHz, though existing links may continue with annual renewal.
5. **Spectrum caps:** A combined ceiling of 8 (eight) carriers across 13 GHz, 15 GHz, 18 GHz, and 21 GHz bands per LSA was recommended to ensure equitable distribution.
6. **Review of 7 GHz and 15 GHz bands:** Usage of these bands will be reviewed post- World Radiocommunication Conference ("WRC") 2027; existing links may continue with annual renewal, but new assignments are restricted, especially in 15 GHz to operators already holding carriers.
7. **E-band and V-band:** E-band (71–76/81–86 GHz) should be used primarily for backhaul, excluding access/ integrated access and backhaul; V-band (57–66 GHz) should be for backhaul and license-exempt low-power indoor/outdoor use on a non-interference basis to align with global practices.
8. **Spectrum charges:** TRAI suggested rationalised charges of INR 75,000 (Indian Rupees seventy-five thousand) per carrier annually for 6/7 GHz, INR 25,000 (Indian Rupees twenty-five thousand) for 21 GHz, 0.10% of AGR for E-band block-based, INR 25,000 (Indian Rupees twenty five thousand) for E-band link-based, and INR 2,500 (Indian Rupees two thousand five hundred) per 50 MHz carrier annually for V-band.

The recommendations specify that no roll-out obligations must be laid for backhaul spectrum, given its supporting role in network infrastructure. The validity of the proposed policy regime was recommended to be 5 (five) years from the date of notification, extendable by 2 (two) years. An online portal was recommended to manage applications, assignments, and maintain a database of links, with a monthly application cycle where entities will be allowed to surrender spectrum with 30 (thirty) days prior notice, and DoT will confirm the surrender within 30 (thirty) days.

SMS notifications under DCA pilot to select customers (limited in number) brought under pilot

On December 10, 2025, TRAI issued a press release announcing the commencement of SMS notifications under the DCA pilot, jointly undertaken with RBI. The initiative aims to digitise and standardise consent for promotional communications. The key points were as follows:

1. Under the TCCCP, customers can block or selectively allow promotional communications. However, legacy consents obtained through paper-based or fragmented digital systems have hindered full implementation of the consent framework. To address this, TRAI and RBI have launched the DCA pilot to provide a unified digital interface for consent management.
2. Pilot scope and participants: The pilot involves 9 (nine) TSPs and 11 (eleven) major banks, including State Bank of India, Punjab National Bank, Axis Bank, ICICI Bank, HDFC Bank, and others. These entities have completed technical development and system integration. Banks have begun uploading sample sets of old consents and new consents onto a shared digital platform.
3. SMS notifications and customer actions:
 - a) SMS notifications will be sent from short code 127000 to a limited set of customers whose old consents are uploaded.
 - b) Each SMS will include a secure link to the authorised Consent Management Page of the respective TSP.
 - c) Customers can view, manage, or revoke consents recorded by participating banks against their mobile numbers.
 - d) No personal or financial information will be requested, and action on the SMS is optional.
4. Objective: The pilot seeks to test platform readiness across TSPs, banks, and the consent registry, ensuring transparency and empowering customers to manage promotional communication consents effectively before nationwide rollout.



Recommendations on the regulatory framework for the sale of foreign TSPs' SIM/eSIM Cards for the use in Machine-to-Machine/Internet of Things devices meant for export

On December 30, 2025, TRAI issued its recommendations on the 'Regulatory Framework for the Sale of Foreign TSPs SIM/eSIM Cards for Use in M2M/IoT Devices Meant for Export'. These recommendations respond to DoTs reference dated September 17, 2024, and aim to establish a light touch regulatory framework under the Telecom Act. The key points are as follows:

1. TRAI concluded that the sale of foreign SIM/eSIM cards for Machine-to-Machine ("M2M")/Internet of Things ("IoT") devices meant for export should be regulated through a separate service authorisation under Section 3(1)(a) of the Telecom Act. This new authorisation, termed 'International M2M SIM Service Authorisation' will fall under the category of auxiliary or miscellaneous service authorisations. TRAI noted that this activity differs fundamentally from the sale of international roaming SIMs for consumers in terms of communication type that is M2M vs. personal, duration of use which is device lifecycle vs. short-term travel, business model such as business-to-business vs. business-to-consumer and regulatory requirements.
2. TRAI recommended a light-touch framework with online, digitally signed auto-generated authorisations. Key conditions include:
 - a) Eligibility: Only companies incorporated under the Indian Companies Act, 2013.
 - b) Application processing fee: INR 5,000 (Indian Rupees five thousand); no entry fee, authorisation fee, or bank guarantee.

- c) Validity: 10 (ten) years, renewable for another 10 (ten) years upon request at least 1 (one) year before expiry.
- d) Service area: National level.
- e) Scope: Sale of foreign TSPs' SIM/eSIM cards to Indian enterprises intending to export M2M/IoT devices fitted with such SIM/eSIM cards.
- f) Know Your Customer ("KYC"): Mandatory KYC of Indian enterprise customers, including corporate identity number, GST registration (if available), and physical verification of premises.
- g) Testing activation: SIM/eSIM cards may be activated in India for testing for a maximum of 6 (six) months post-KYC; they must not be pre-activated and must be deactivated before export.
- h) Reporting: Monthly online reports to designated agencies detailing customer information, SIM identifiers (IMSI/MSISDN), country of origin, and activation/suspension dates; annual returns to DoT.
- i) Commercial terms: Tariffs and other commercial conditions to be mutually agreed between the authorised entity and enterprise customers.

3. TRAI recommended that DoT coordinate with relevant ministries to establish clear guidelines for:
 - a) import of foreign SIM/eSIM profiles and cards for use in export-bound devices;
 - b) export of Indian SIM/eSIM cards for devices meant for foreign markets; and
 - c) import/export of devices embedded with SIM/eSIM cards.

Further, TRAI advised that restrictions applicable to domestic M2M SIMs such as mandatory 13-digit MSISDN and IP whitelisting should not apply to foreign SIM/eSIM cards meant for export, as foreign regulations will govern their use. It also reaffirmed earlier recommendations on roaming and global IMSI usage for M2M devices, maintaining existing security safeguards.



Framework for establishing telecommunication infrastructure in building development

On July 9, 2025, DoT issued a notification establishing a framework to integrate telecommunication infrastructure into building development regulations. This is to ensure that buildings are equipped with reliable telecommunication services. The framework inter alia provides for the following:

1. specific responsibilities for various government bodies and institutions such as the Bureau of Indian Standards, the TEC, the Ministry of Rural Development, the National Communications Academy – Technology (“NCA-T”) are outlined. Further, the Ministry of Housing and Urban Affairs (“MoHUA”) is tasked with updating the Model Building Bye-Laws to include telecommunication infrastructure as a core utility. It must ensure that Enabling Telecommunication Infrastructure (“ETI”) is treated as essential in building plans and allow states to decide whether building ratings for telecommunication connectivity should be mandatory or voluntary. MoHUA is also expected to integrate ETI provisions into builder-buyer agreements under the Real Estate Regulatory Authority, making them enforceable. Additionally, MoHUA will develop standardised formats for issuing No Objection Certificate (“NOC”) related to telecommunication infrastructure during building plan approvals and post-construction;
2. telecommunication infrastructure is defined in 3 (three) distinct parts to standardise its implementation across buildings. The first part is ETI, which includes physical components such as

entrance facilities, underground conduits, fibre cables, and equipment rooms which must be installed during the construction phase for provisioning telecommunication services before a building receives its occupancy certificate. The second part is indoor mobile coverage, which involves systems like IBS and Distributed Antenna Systems (“DAS”) to ensure strong mobile signal coverage inside buildings. The third part is telecommunication equipment, which includes base stations and associated hardware that feed the IBS/DAS systems;

3. NCA-T will maintain a registry of certified professionals and act as the nodal agency for all matters related to telecommunication infrastructure workforce development, define qualifications, roles, and responsibilities for these professionals; and
4. to ensure effective implementation, a quarterly review committee will be established.

Framework and guidelines for classification of critical services in the M2M/IoT sector

On July 29, 2025, DoT issued an Office Memorandum (“OM”) establishing a framework for identifying and regulating critical M2M and services across Government ministries and regulatory bodies. The OM adopts the TRAI recommendations dated April 22, 2025, on issues related to critical M2M services and transfer of M2M SIM ownership. Some of the key outcomes are as follows:

1. critical M2M/IoT services are specific applications that demand ultra-reliable, low-latency M2M/IoT connectivity with very high availability, where any disruption of the M2M/IoT connectivity used for delivering the service will have a huge impact on national security, economy, public health, or public safety;
2. critical status is applied only to individual services within a domain or sector that satisfy the twin criteria of ultra-reliable connectivity and huge impact upon disruption, rather than classifying entire domains or sectors as critical;
3. any M2M/IoT service will be considered non-critical unless it is identified and notified as a critical M2M and IoT service by the concerned

ministry or regulatory body, in consultation with DoT and assisted by TEC;

4. each concerned ministry or regulatory body will constitute a standing committee comprising officers with relevant domain knowledge and TEC nominees to identify and recommend specific M2M/IoT services that meet the criteria of criticality and to recommend appropriate and measurable service performance benchmarks for each identified service;
5. after consideration of the standing committee's recommendations, the concerned ministry or regulatory body will notify the telecommunication service performance benchmarks for each critical M2M/IoT service separately. TEC will establish and maintain an online repository of sector-wise critical M2M and IoT services along with their corresponding regulatory requirements;
6. under the Telecommunications (Framework to Notify Standards, Conformity Assessment and Certification) Rules, 2025, the Mandatory Testing and Certification of Telecom Equipment framework will be applied in a phased manner to the communication modules of devices used in critical M2M and IoT services and to high-volume non-critical modules determined by the standing committee, to ensure compliance with safety, security, and performance standards; and
7. ministries and regulatory bodies are advised to constitute their standing committees at the earliest and coordinate. Further, DoT, through the TEC, is committed to providing all necessary support and technical assistance for the smooth and effective implementation of this framework.



Instructions for provisioning of telecommunication services to Person with Disabilities

On July 31, 2025, DoT issued instructions to Unified Access Service ("UAS")/UL (access service authorisation/Virtual Network Operator ("VNO")) licensees regarding provisioning of telecommunication services to Persons with Disabilities ("PWDs"), basis the earlier guidelines and in compliance with the Supreme Court of India ("Supreme Court") judgment in the case of *Amar Jain vs. Union of India*¹. The key points of the instructions are as follows:

1. licensees must ensure strict adherence to the instructions and implement the existing KYC process in a manner accessible and inclusive for PWDs;
2. licensees must inform PWD customers regarding the choice of extant KYC processes, Electronic KYC ("e-KYC"), Digital KYC ("D-KYC"), self-KYC, and paper-based KYC, and will not deny telecommunication services due to non-completion of KYC on account of disability;
3. if PWD customers opt for e-KYC, D-KYC or self-KYC, the liveness detection mechanism for live photographs or videos will not be limited to eye blinking alone. The licensees are required to incorporate alternative methods to ensure inclusivity. The photograph of the PWD certificate will also be captured by Point of Sale ("PoS");
4. licensees are required to ensure the availability of paper-based KYC as an accessible alternative for PWD customers who choose this option, with copies of PWD certificates attached to the Customer Application Form ("CAF");
5. CAF and the database are required to include mandatory fields for identification of PWD status and disability type with percentage;
6. licensees are required to appoint a designated officer to address issues faced by PWD customers. PoS facing difficulties enrolling PWD customers are required to refer such cases, along with the relevant details, to the designated officer who will take appropriate action and update systems accordingly;

¹ WP(C) No. 49/2025

7. the designated officer will review the KYC applications of PwD customers rejected by the automated systems and may approve enrolment after recording reasons in writing on the CAF, if deemed appropriate;
8. licensees are required to establish a grievance redressal mechanism for PwD customers to report accessibility-related issues during the KYC process or while using services;
9. establish a dedicated desk or helpline within their customer support centres staffed by personnel, trained to assist PwDs. The licensees will conduct disability awareness and training programs periodically for PoS, designated officers, and employees to better sensitise them to issues raised by PwD customers; and
10. licensees will need to submit an accessibility compliance report on January 1st and July 1st of every year through the *Saral Sanchar* portal, beginning on January 1, 2026, signed by an authorised signatory. The instructions will be applicable from 1 (one) month after issuance of the letter, which is from August 31, 2025.

Advisory on deployment of oneM2M standards based IoT solutions

On August 21, 2025, DoT issued an advisory on deployment of oneM2M standards-based IoT solutions ("Advisory") committing to fostering a secure and interoperable IoT ecosystem in the country. The important terms of the Advisory are specified below:

1. it was noted in the Advisory that TEC, the nodal agency for standards, requires all notified telecommunication equipment to be tested and certified before being sold or imported. In this backdrop, the essential requirements are prepared for various IoT devices, including IoT gateways, feedback devices, tracking devices, smart electricity meters, and end point devices for environmental monitoring. TEC has adopted oneM2M Release 2 and Release 3 specifications as National Standards in 2020 and 2022, respectively, which support the development of standardised IoT ecosystem in India. Additionally, the rapid growth of proprietary IoT solutions in the country has highlighted the urgent need for standardisation; and

2. accordingly, the Advisory provides that all the ministries, departments, Government organisations as well as IoT stakeholders viz., M2M service providers, IoT device manufacturers, should deploy IoT solutions based on oneM2M standards for creating smart infrastructures so that all the applications/use cases deployed are interoperable and secure.



DoT instructions to the licensees with internet service authorisation regarding compliance to security conditions of the license agreements

On September 30, 2025, DoT issued a notification to all licensees holding internet service authorisation under the UL framework. The communication reminded licensees to strictly comply with specific security conditions outlined in the license agreement. Under the license agreement, clause 39.3 required that all foreign personnel involved in installation, operation, or maintenance of the licensee's network must be security cleared by the MHA before deployment. Clause 39.23(vi) of the license agreement mandated that the majority of directors on the licensee's board must be Indian citizens. Clause 39.23(vii) of the license agreement states that if the positions of Chairman, Managing Director, Chief Executive Officer, or Chief Financial Officer are held by foreign nationals, those individuals must undergo annual security vetting by MHA, and any adverse findings will be binding on the licensee.

DoT had observed lapses in compliance with the aforesigned license conditions and had instructed all internet service providers to adhere strictly to these and other security related provisions. DoT had stated that non-compliance may lead to license termination following due process.



Guidelines for use, retention, and disposal of Wireless Equipment under Wireless Operating Licenses/Experimental/Demo licenses

DoT issued the Guidelines for Use, Retention, and Disposal of Wireless Equipment under Wireless Operating Licenses ("WOL")/Experimental/Demo Licenses ("Wireless Equipment Guidelines") dated October 15, 2025. The Wireless Equipment Guidelines broadly stated the following:

1. Purpose and applicability: The Wireless Equipment Guidelines clarified procedures for handling wireless equipment under WOL, Experimental, and Demo licenses upon cancellation, expiry, or termination. They apply to all licensees under the Wireless Planning and Coordination ("WPC") wing, Regional Licensing Offices ("RLO"), and Wireless Monitoring Organisation ("WMO"), effective immediately.

2. Disposal timelines:

- a) Cancellation: Equipment must be disposed of within 90 (ninety) days or a regular Non - Dealer Possession License ("NDPL") must be obtained.
- b) Expiry: Disposal must be completed within 30 (thirty) days of expiry; equipment is treated as under deemed NDPL during this period.
- c) Termination: Disposal must occur within 15 (fifteen) days, with submission of a surrender certificate.

3. Retention for future use: Entities wishing to retain equipment for future licensed use must obtain an NDPL from the WMO field office.

4. Permitted disposal methods:

- a) Return to source or authorised dealer.

- b) Transfer to another valid license.
- c) Destruction in presence of WMO officer or dealer possession license holder.
- d) Government departments/PSUs may self-certify destruction with intimation to WPC.

- 5. **E-Waste compliance:** All e-waste must be disposed of per the E-Waste (Management) Rules, 2022, including equipment used for transmitting or receiving telecom signals.
- 6. **Future updates:** The Wireless Equipment Guidelines may be revised following notification of Frequency Assignment Rules under the Telecom Act.

Telecommunications (Telecom Cyber Security) Amendment Rules, 2025

DoT issued the Telecommunications (Telecom Cyber Security) Amendment Rules, 2025 ("Cyber Security Amendment Rules"), vide notification dated October 22, 2025, under the Telecom Act. They amend the existing Telecommunications (Telecom Cyber Security) Rules, 2024, and aim to strengthen the regulatory framework for cyber security in the telecom sector. The Cyber Security Amendment Rules broadly stated the following:

- 1. **New definitions:** The Cyber Security Amendment Rules introduced key definitions including 'licensee' (a person licensed under the Indian Telegraph Act, 1885), Mobile Number Validation ("MNV") platform for verifying telecom identifiers), and Telecommunication Identifier User Entity ("TIUE"), i.e., entities using telecom identifiers for customer identification or service delivery.
- 2. **Expanded obligations for TIUEs:** The Cyber Security Amendment Rules extended several obligations and compliance requirements to TIUEs, in addition to existing telecommunication entities. These included sharing of data related to telecommunication identifiers used by a TIUE, validation processes for telecommunications identifier and adherence to cyber security directives.
- 3. **Emergency suspension powers:** The Central Government is empowered to direct both telecom entities and TIUEs to temporarily suspend the use

of specific telecommunication identifiers without prior notice, if deemed necessary in the public interest.

4. **Permanent restrictions and modifications:** The Central Government has the powers to issue orders for permanent disconnection or restriction of telecommunication identifiers, including directions to TIUEs to limit their use for identification or service delivery.
5. **Establishment of MNV platform:** An MNV platform will be established to enable validation of telecommunication identifiers. TIUEs and Government agencies may request validations through this platform, subject to applicable fees and data protection compliance.
6. **International Mobile Equipment Identity ("IMEI") management and restrictions:** The Cyber Security Amendment Rules introduced provisions to prevent the reuse of IMEI numbers. Manufacturers and importers must ensure that new telecom equipment does not use IMEIs already active in Indian networks. A central database of tampered or restricted IMEIs will be maintained.
7. **Used equipment sale compliance:** Entities involved in the sale or purchase of used telecom equipment must verify IMEI numbers against the central database before transactions, ensuring that blacklisted IMEIs are not reused.
8. **Enhanced compliance and enforcement:** The Cyber Security Amendment Rules reinforced the role of the Central Government in issuing directions and overseeing compliance, including for TIUEs, with respect to cyber security, identifier validation, and equipment regulation.



Framework for transfer of M2M SIM ownership between M2M Service Providers or licensees

DoT issued the Framework for Transfer of M2M SIM ownership between M2M Service Providers ("M2MSPs"), *vide* notification dated October 28, 2025, pursuant to TRAI's recommendations on critical services in the M2M sector. The framework outlines the procedure for seamless transfer of ownership of M2M SIMs between registered M2MSPs. The framework broadly stated the following:

1. **Initiation by M2M service user:** The transfer process began with a formal written request from the M2M service user or third party to the existing M2MSP ("Transferor"), specifying the SIMs to be transferred and the intended transferee M2MSP ("Transferee").
2. **NOC:** Upon receiving the request, the Transferor must issue a NOC to the concerned Access Service Provider ("ASP") within 15 (fifteen) days, confirming the user's request and listing the SIMs for transfer, subject to clearance of dues.
3. **Undertaking by Transferee:** The Transferee must submit a formal undertaking to the ASP, accepting all responsibilities and liabilities for the transferred SIMs, including compliance with KYC norms and maintaining records of device custodians.
4. **Verification and update by ASP:** ASP will verify the NOC and undertaking, conduct fresh KYC, and update subscriber records to reflect the change in ownership. The M2M service must remain uninterrupted during the transfer process.
5. **Annexure A.1:** This annexure provides the format for the user initiated request to be submitted by the M2M service user or third party to the Transferor M2MSP. It includes details of the SIMs and devices proposed for transfer and confirms the legitimacy of the request.
6. **Annexure A.2:** This annexure contains the format for the NOC to be issued by the Transferor to the concerned ASP. It confirms the Transferor's consent for the SIM ownership transfer and clearance of dues.
7. **Annexure A.3:** This annexure outlines the undertaking format to be submitted by the Transferee to ASP. It affirms the Transferee's

acceptance of all responsibilities and liabilities related to the transferred SIMs and compliance with regulatory requirements.



Instructions for handling anticipated KYC issues during implementation of CNAP service in India

On November 21, 2025, DoT issued instructions ("Instructions") to all UAS and UL holders with access service authorisation regarding handling anticipated KYC-related issues during the implementation of CNAP service in India. The Instructions broadly stated the following:

- 1. Calling Line Identification Restriction ("CLIR"):** Subscribers with CLIR activated as per DoT guidelines will not have their Caller ID Name ("CNAM") displayed to the called party during CNAP trials or rollout, ensuring privacy compliance.
- 2. Bulk or business connections:** Entities with bulk or business connections may display a 'preferred name' instead of the CAF name. This name must be officially recognised such as trademark, GST trade name, and supported by valid documents. For new connections, record the preferred name in both CAF and Subscriber Data Record ("SDR") with documents attached. For existing connections, licensees must verify and update SDR based on submitted documents. Licensees are accountable for misuse and must confirm ownership during inspections.
- 3. Display priority:** CNAP will show 2 (two) fields namely calling number as usual and calling name based on priority, the name saved in the called party's contacts; CNAM or preferred name from

CAF/SDR for domestic calls, or 'International Call' for international calls.

- 4. Complaint handling:** Licensees must set up a mechanism (helpline, app, or portal) for complaints about incorrect name display during CNAP trials. Complaints must be compiled and reported weekly for 2 (two) weeks to the Licensing Policy Division. DoT may issue further instructions based on these reports.

Amendment/clarification to the existing KYC instructions

On November 21, 2025, DoT issued a letter ("Letter") to all UAS/UL and UL (VNO) having access service authorisation licensees regarding amendments and clarifications to existing KYC instructions. The Letter follows a process audit conducted across all LSAs to assess compliance with DoT instructions on D-KYC and e-KYC processes, which revealed several deviations in implementation. The Letter broadly stated the following:

- 1. Auto-population via QR code:** DoT clarified that auto-populating demographic details in CAF by scanning QR codes on Proof of Identity/Proof of Address ("PoI/PoA") as per April 3, 2019, instructions is optional, not mandatory, and intended to reduce manual errors.
- 2. Deletion of mAadhaar auto-population:** The mandatory requirement for auto-population via Aadhaar QR code using mAadhaar app/API as per the August 31, 2023, instructions was deleted, as integration was not feasible.
- 3. Limit on D-KYC connections:** DoT amended rules to cap issuance at 2 (two) mobile connections per subscriber per day through D-KYC, regardless of multiple PoI/PoA documents. Licensees must implement systems to enforce this and repeat verification for each connection.
- 4. Deletion of network location capture:** Requirement to capture network-determined PoS location was removed due to technical issues. Licensees must still ensure GPS coordinates are accurate and unedited.
- 5. Visibility/editability in e-KYC:** Only the customer's name from UIDAI should be visible to PoS agents; other details must be entered

separately. Further, the UIDAI fetched data cannot be edited.

- Uniform PoS identifier:** Licensees must use unique PoS ID consistently across all places—watermarks on photos/PoI/PoA images, CAF, and SDR as per August 31, 2023, guidelines.

- Compliance timeline:** All changes must be implemented within 1 (one) month of the Letter. Non-compliance will be treated as a license violation.

Clarification on SUC revision order for assignment of frequencies to captive users (being charged on formula basis) for different types of radiocommunication services

On November 24, 2025, DoT issued a Clarification Order ("Order") regarding the interpretation and application of the SUC revision order dated December 11, 2023, for assignment of frequencies to captive users under various radiocommunication services. The Order broadly stated the following:

- Incremental spectrum charges:** These charges apply only to fixed site operations as per Para (xiv) of Schedule II. It will not be applicable to area based networks i.e. district, state, or pan-India. For district wide networks, royalty will be calculated by multiplying Category 3 charges by 5 (five).
- Charging of radar below 960 MHz:** Radars below 960 MHz charged at same royalty rates as 960–2690 MHz band.
- Charging methodology for Delhi:** Fixed site charging applies even if coverage spans multiple districts. Area-based charging only if multiple networks cover entire State.
- Classification of fixed vs. area-based:** Networks smaller than Category 3 (30–60 km) use fixed-site charging, regardless of district count.
- Spectrum charges for licenses beyond 1 year:** Revised charges apply from renewal month after April 1, 2024. For licenses less than 1 (one) year, new charges start from anniversary date post April 1, 2024.
- Minimum royalty for Multi-band Personal Broadcasting ("MPB"):** Under Category 1 for MPB in Schedule II, minimum royalty will be INR 3,000

(Indian Rupees three thousand) and not INR 2,000 (Indian Rupees two thousand).



Sanchar Saathi app pre-installation requirement withdrawn

On November 28, 2025, DoT issued directions mandating pre-installation of the *Sanchar Saathi* mobile application on all handsets manufactured or imported for use in India. The initiative aimed to enhance telecom cybersecurity, prevent the sale of non-genuine devices, and curb misuse of telecom resources for cyber frauds. Manufacturers were required to implement this within 90 (ninety) days and submit compliance reports within 120 (one hundred and twenty) days.

However, on December 3, 2025, the Ministry of Communications announced that the mandatory pre-installation requirement is removed. The *Sanchar Saathi* app will remain optional for users. The app empowers citizens to verify handset genuineness, report suspected fraud communications, block lost or stolen devices, check mobile connections in their name, and access trusted contact details of financial institutions. It supports multiple languages and is part of a broader effort to strengthen consumer protection and curb telecom-related cyber frauds.

National Frequency Allocation Plan - 2025

On December 30, 2025, DoT issued the NFAP-2025, a comprehensive policy document providing a regulatory framework for the allocation and management of radio frequency spectrum in India, covering the range from 8.3 KHz to 3000 GHz. The plan is aligned with the ITU Radio Regulations 2024 edition ("ITU Radio Regulations") and incorporates decisions from the WRC-23.

NFAP-2025 aims to ensure efficient, equitable, and interference free use of spectrum, which is a finite national resource. It supports India's vision for Digital India, *Aatmanirbhar Bharat*, and future technologies such as 5G Advanced, 6G/IMT-2030, satellite communications, IoT, and Vehicle-to-Everything ("V2X"). The plan also facilitates innovation, promotes indigenous manufacturing, and provides a predictable regulatory environment for stakeholders.

The NFAP-2025 introduces several strategic revisions to meet the growing spectrum demands of next-generation technologies and ensure India's spectrum framework remains globally harmonised, high-capacity, and future-ready. The major updates of NFAP-2025 are as follows:

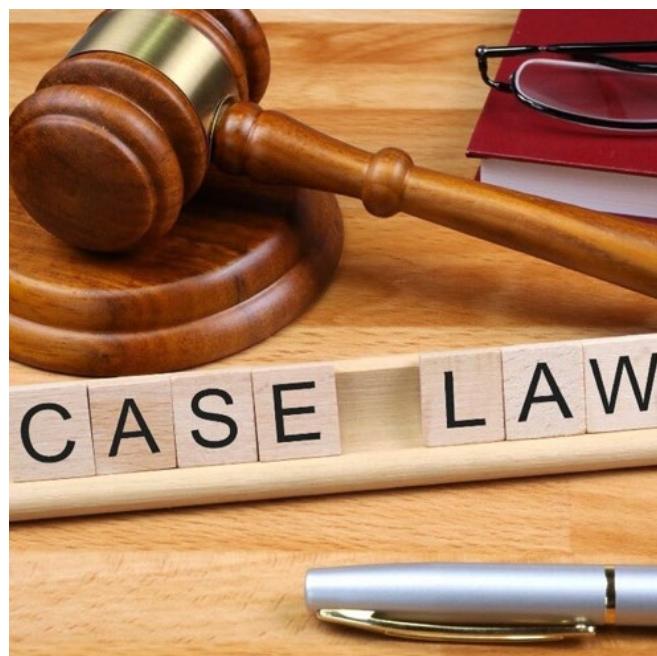
1. **Expansion of IMT spectrum:** One of the most significant updates is the identification of the 6425–7125 MHz band for IMT. This mid-band spectrum is crucial for enhancing capacity for 5G, 5G Advanced, and upcoming 6G networks, enabling faster speeds, lower latency, and improved connectivity for advanced applications like smart cities, AR/VR, and industrial automation.
2. **Satellite communication enhancements:** NFAP-2025 earmarks Ka-band (27.5–31 GHz) and Q/V bands (40.0–42.5 GHz, 47.7–50.2 GHz, and 50.4–51.4 GHz) for satellite based services. These allocations will support high-throughput satellite in geostationary orbit and large NGSO constellations, which are essential for broadband proliferation, remote connectivity, and global interoperability.
3. **In-Flight and Maritime Connectivity ("IFMC"):** Additional spectrum is identified for IFMC services in bands such as 12.2–12.5 GHz, 17.7–18.7 GHz, and 27.5–28.5 GHz. This will enable seamless broadband access for passengers on aircraft and ships, ensuring uninterrupted connectivity during travel.
4. **Support for emerging technologies:** NFAP-2025 recognises the importance of new technologies like:
 - a) High Altitude Platform Stations and High Altitude IMT Base Stations to extend coverage to remote and underserved areas;
 - b) V2X communications for intelligent transport systems, with specific allocations such as

5875–5925 MHz for ITS/V2X under mobile services; and

- c) spectrum alignment for trunking services, PPDR, and programme making and special events without constraining other services.

5. **IoT and M2M connectivity:** The plan emphasises the growing role of SRDs and ultra-wideband technologies, which are critical for IoT and M2M applications. These include medical implants, ground probing radars for security, and smart utility systems. NFAP-2025 provides clarity on license exempt applications, fostering innovation in consumer and industrial IoT ecosystems.
6. **Harmonisation and global alignment:** All updates are aligned with ITU Radio Regulations and WRC-23 outcomes, ensuring India's spectrum policies support international harmonisation. This facilitates global interoperability, encourages foreign investment, and strengthens India's position in the global telecom ecosystem.

The NFAP-2025 is significant because it provides a clear, globally harmonised roadmap for efficient spectrum use, enabling India's transition to advanced technologies like 5G, 6G, IoT, and satellite communications while supporting national security, disaster relief, and critical services. It bridges the digital divide by ensuring connectivity in remote areas, fosters economic growth through investment and domestic manufacturing, and positions India as a competitive player in the global telecom ecosystem, driving innovation and future readiness.



Case laws

Bharti Airtel Limited and Ors. vs. Commissioner of Central Excise

The Supreme Court, *vide* an order² dated August 8, 2025, dismissed the special leave petition filed by the Commissioner of Central Excise, Pune, and upheld the Delhi High Court ("Delhi HC") judgment in the appeal filed by Bharti Airtel Limited, Tata Teleservices Limited, Reliance Communications and other TSPs against the decision of the Customs, Excise and Service Tax Appellate Tribunal ("CESTAT"), dated August 26, 2014, where CESTAT had concluded that the towers, shelter and other accessories used by the TSPs for providing telecom services are immovable property.

The Delhi HC held that mobile towers, shelters, and other accessories do not come under the purview of an accessory permanently annexed to the earth for the beneficial enjoyment of the owner of the land. Accordingly, they do not come under the category of immovable property as defined under per Section 3(26) of the General Clauses Act, 1897 and Section 3 of the Transfer of Property Act, 1882. Therefore, the TSPs can claim for cenvat credit under the Cenvat Credit Rules, 2004.

For the telecom sector, the dismissal of the appeal against the judgment of the Delhi HC is a financial relief that encourages capital investment, accelerates network expansion, and promotes infrastructure sharing. It also enhances regulatory clarity around tax treatment of telecommunication infrastructure, which is crucial for long-term planning and competitiveness in a capital-intensive industry. The telecommunication towers are the backbone of the telecommunication sector, and any denial of this credit would substantially increase the cost of providing this service to the common man. For consumers and end users, the judgment is likely to translate into improved network coverage, faster deployment of telecom services, and potentially more competitive pricing as operators gain greater financial flexibility to invest in service quality and innovation.



Vodafone Idea Limited and Anr. vs. Union of India

The Supreme Court, *vide* an order³ dated October 27, 2025, disposed of a writ petition filed by Vodafone Idea Limited ("Vodafone Idea"), Bharti Airtel Limited and Tata Teleservices Limited, thereby permitting the Union of India to reconsider the additional AGR demands raised for the period up to financial year 2016-2017, in accordance with law and subject to its policy discretion. Taking note of the Union Government's acquisition of 49% equity in Vodafone Idea and the potential impact on approximately 20,00,00,000 (twenty crore) subscribers, the Supreme Court held that there was no impediment to the Union of India reassessing and reconciling AGR dues in line with the Deduction Verification Guidelines ("DV Guidelines") dated February 3, 2020, if it so decides in public interest. The DV Guidelines were formulated to standardise and digitise the process of verifying deductions claimed by TSPs to arrive at their AGR for license fee and SUC assessment.

However, the Supreme Court clarified that the relief and observations are confined to Vodafone Idea and are premised on the peculiar facts of substantial Government equity infusion and the large consumer base, highlighting a policy driven approach rather than a general reopening of AGR liabilities across the telecom sector. Therefore, the liability for Bharti Airtel Limited and Tata Teleservices Limited remains bound to the earlier verdict.

² (2024) 132 GSTR 404: 2024 SCC OnLine SC 3374

³ W.P (C) No. 882 of 2025

Telecommunications & Broadcasting Practice

Our communications practice is handled by a team with specific domain-expertise, and we advise various stakeholders in both telecom & broadcasting sectors on a wide range of transactions and assignments that involve constitutional, legal, contractual, commercial, regulatory and policy advice. We advise broadcasters, BPOs, Internet Service Providers (ISPs), operators and investors in the Global System for Mobile Communications (GSM) and the Code Division Multiple Access (CDMA) technologies, and new investors on diverse licensing issues, entry strategies, structuring, national security challenges, and other regulatory issues. Some of the main aspects handled / negotiated / advised by us include commercial arrangements; mergers & acquisitions (including FDI) and joint ventures; spectrum allocation; communication satellites; and regulatory compliances and strategic advice including handling regulatory proceedings. We represent the interests of licensees and other stakeholders in interacting with the licensor and regulators with respect to reforms in the regulatory and policy framework to facilitate business growth drawing upon international best practices. We advise and represent investors, broadcasters, and telecom licensees on commercial transactions in this sector, including restructuring, divestment, licensing, and project financing (vendor financing and corporate finance). We advise telecom service providers and other corporate houses on all aspects of spectrum licensing and allocation, including fundamental issues relating to the scope of spectrum bands, the regulatory framework governing their allocation in India, and planning, strategising and following up on their application to the Government. We advise and represent diverse entities in proceedings before the concerned licensing, regulatory, judicial and quasi-judicial authorities (including DoT, MIB, TRAI, TDSAT, various High Courts and the Supreme Court). In such proceedings we assist clients in developing strategies, render opinions, draft pleadings and lead/assist in the proceedings. We have a strong track-record of providing quality advice and concrete results to the above segments of the communications industry, and have been engaged in handling the key legal, regulatory and policy issues that have historically arisen in the industry.

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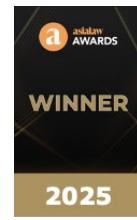


19 Practices and
40 Ranked Lawyers

7 Ranked Practices,
21 Ranked Lawyers

15 Practices and
20 Ranked Lawyers

13 Practices and
49 Ranked Lawyers



20 Practices and
24 Ranked Lawyers

8 Practices and
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