



June 2026

Telecommunications authorisation regime, 2026: Key features of the new authorisation based framework

On June 23, 2026, the Department of Telecommunications (“**DoT**”) notified the Telecommunications (Authorisation for Provision of Principal Telecommunication Services) Rules, 2026 (“**Principal Services Rules**”), the Telecommunications (Authorisation for Provision of Miscellaneous Telecommunication Services) Rules, 2026 (“**Miscellaneous Services Rules**”), the Telecommunications (Authorisation for Captive Telecommunication Services) Rules, 2026 (“**Captive Services Rules**”), and the Telecommunications (Terms and Conditions for Migration) Rules, 2026 (“**Migration Rules**”). These rules operationalise the authorisation framework contemplated under the Telecommunications Act, 2023 (“**Telecom Act**”) and mark the transition from the erstwhile licence based regime to a new authorisation based framework for telecommunications services and networks in India. The transition is not an immediate extinction of all existing licences where the licences, registrations and permissions granted under the earlier regime may continue for their existing term, or, where no definite validity period is specified, for 5 (five) years from the appointed day, unless migrated earlier in accordance with the Migration Rules. Collectively, the rules consolidate several existing licensing categories, establish distinct authorisation frameworks for principal, specialised and captive telecommunications services, and introduce detailed provisions relating to eligibility, authorisation procedures, financial obligations, service delivery, security, data localisation, lawful interception, network operations and regulatory oversight.

Telecom portal – Digital first implementation of the new regime

A notable feature of the new authorisation framework is its implementation on a ‘digital by design’ basis. Following notification of the authorisation and migration rules on June 23, 2026, the DoT has operationalised the ‘[Telecom eServices Portal](#)’ for submission of applications for fresh authorisations as well as migration of existing licences to the new authorisation regime under the Telecom Act. The launch of the portal marks the formal commencement of the transition process and replaces the interim suspension of applications for various licences, registrations, permissions and no-objection certificates that had been imposed pending notification of the new framework. The digital platform is expected to serve as a single-window interface for applications, approvals and migration under the new regime, reflecting the Government’s broader objective of simplifying regulatory processes and improving ease of doing business in the telecommunications sector.

Principal Service Rules

The Principal Services Rules establish the core framework governing the provision of public telecommunications services and replace multiple legacy licences and permissions with a consolidated authorisation structure.

Scope of authorisations

The Principal Services Rules introduce authorisations for various categories of principal telecommunications services, including:

1. unified service authorisation;
2. access service authorisation;
3. wireline access service authorisation;
4. Internet Service Authorisation (“ISA”); and
5. Long Distance Service Authorisation (“LDSA”).

The framework contemplates authorisations for both Network Service Operators (“NSOs”) and Virtual Network Operators (“VNOs”), thereby preserving the existing distinction between entities owning telecommunications infrastructure and entities providing services through leased network capacity.

The Principal Services Rules also regulate a broad range of telecommunications services, including access services, internet services, internet telephony, domestic and international leased circuits, national and international long distance services, satellite services, cable landing stations and submarine cable systems.

Eligibility and application process

The applicants are required to be a company incorporated in India and satisfy prescribed minimum paid-up equity capital and net-worth requirements specified in the schedules. The applicant must also comply with applicable Foreign Direct Investment (“FDI”) requirements and have no outstanding dues payable to the Central Government.

The applications are required to be submitted through the designated portal along with prescribed processing fees, supporting documentation and an auditor’s certificate certifying compliance with eligibility requirements. Where an applicant holds any overlapping licence or authorisation covering the same scope and service area, such licence or authorisation is required to be surrendered.

The Central Government may conduct such inquiries as it considers necessary before issuing a letter of intent specifying applicable entry fees, guarantees and other conditions to be fulfilled before grant of authorisation.

Financial conditions

The Principal Services Rules prescribe detailed financial obligations including:

1. processing fees;
2. entry fees;
3. annual authorisation fees;
4. spectrum-related charges; and
5. performance guarantees.

A noteworthy feature is the continuation of the Adjusted Gross Revenue (“AGR”) linked charging framework, under which annual authorisation fees are generally payable at prescribed percentages of AGR, subject to applicable minimum amounts. The rules also provide detailed mechanisms for quarterly payments, annual reconciliations, accounting, audits and reassessment of fees.

The Principal Services Rules further empower the Government to recover unpaid dues, adjust outstanding amounts against guarantees and recover unpaid amounts as arrears of land revenue.

Technical and operational framework

The Principal Services Rules permit authorised entities to establish, operate, maintain and expand telecommunications networks using any technology capable of providing the authorised service.

The authorised entities may enter into infrastructure sharing arrangements and interconnection arrangements with other authorised entities, subject to prescribed conditions and applicable regulatory requirements. The rules also require compliance with government-notified technical standards, numbering plans, frequency allocation frameworks and quality of service obligations.

The Principal Services Rules contain extensive provisions relating to:

1. mobile number portability;
2. emergency and disaster management communications;
3. interconnection;
4. internet exchange points;
5. domestic and international leased circuits;
6. international traffic routing; and
7. cable landing stations.

Internet, long distance and satellite services

One of the most detailed portions of the Principal Services Rules relates to internet, long distance and satellite-based services.

ISA holders are permitted to provide internet access, internet leased lines, internet telephony and machine-to-machine connectivity services, subject to specified limitations. The rules preserve net neutrality principles by prohibiting discriminatory treatment of internet content, applications, services, devices or protocols except in limited circumstances such as compliance with law, national security requirements or network integrity considerations.

LDSA holders may provide national and international long-distance carriage services, domestic and international leased circuits, and associated bearer services. Detailed provisions regulate traffic routing, international gateways, interconnection and international leased circuits.

The satellite framework introduces comprehensive requirements relating to:

1. satellite earth station gateways located in India;
2. routing of traffic through Indian gateways;
3. terminal registration requirements;
4. lawful interception and monitoring capabilities;
5. geolocation controls;
6. restrictions on foreign routing of domestic traffic; and
7. deployment of satellite user terminals.

User verification and consumer protection

The Principal Services Rules impose extensive user-verification obligations, including KYC requirements, business-user verification obligations, maintenance of subscriber records and periodic verification exercises. Enhanced

verification requirements apply to business connections, leased circuits, SIP trunks, internet leased lines and other enterprise services.

Authorised entities must maintain online grievance redressal systems, publish information relating to service availability, notify users regarding service closures and facilitate number portability where applicable.

Security conditions

The Principal Services Rules contain a robust security framework requiring:

1. localisation of specified data, logs and network information within India;
2. deployment of lawful interception and monitoring systems;
3. use of trusted telecom products and trusted sources;
4. restrictions on remote access from outside India;
5. maintenance of fraud detection and cybersecurity systems;
6. cooperation with authorised interception agencies; and
7. implementation of government directions relating to national security.

The rules also prescribe governance requirements relating to Indian management, security vetting of foreign personnel occupying sensitive positions and protection of telecommunications networks from unauthorised access and cyber threats.

Transfer, renewal and revocation

The Authorisations may generally remain valid for up to 20 (twenty) years and may be renewed. The rules provide detailed procedures governing transfer, surrender, renewal and revocation of authorisations. The transfers generally require prior approval of the Central Government and are typically permitted only in specified circumstances such as mergers, acquisitions or insolvency-related restructurings.

Miscellaneous Service Rules

The Miscellaneous Services Rules establish separate authorisation frameworks for specialised telecommunications services that do not fall within the traditional categories of access, internet or long-distance telecommunications services.

Scope of services

The Miscellaneous Services Rules create authorisation categories for:

1. Public Mobile Radio Trunking Services (“**PMRTS**”);
2. enterprise communication services covering audio conferencing services, audiotex services, cloud-based Electronic Private Automatic Branch Exchange (“**EPABX**”) services and voicemail services;
3. Machine-to-Machine (“**M2M**”) services;
4. Prime Minister Wi-Fi Access Network Interface (“**PM-WANI**”) services;
5. in-flight and maritime connectivity services; and
6. Aeronautical Data Communication Services (“**ADCS**”).

Eligibility and grant of authorisation

The authorisations are generally available to Indian companies complying with applicable FDI requirements and eligibility conditions. However, under the Miscellaneous Services Rules, M2M service authorisations may additionally be obtained by limited liability partnerships, partnerships, sole proprietorships, trusts, government entities and certain other entities. This authorisation category should be distinguished from the separate Central Government orders, directions and guidelines M2M services, which continues to be relevant unless specifically migrated, superseded or replaced under the new authorisation framework.

Applications are required to be submitted through the designated portal together with prescribed processing fees and supporting documents. The authorisations are generally granted on a non-exclusive basis for periods extending up to 20 (twenty) years.

PMRTS

The Miscellaneous Services Rules modernise the PMRTS framework and prescribe obligations relating to:

1. use of trunked radio networks;
2. deployment of repeater stations;
3. rollout obligations;
4. maintenance of monitoring facilities;
5. AGR-linked authorisation fees;
6. spectrum charges; and
7. user terminal management.

The rules continue to require PMRTS operators to comply with spectrum assignment conditions and prescribed operational requirements.

M2M services

The formal recognition of M2M services as a distinct authorised telecommunications service is a significant development. The Miscellaneous Services Rules govern:

1. wireless personal area network and local area network deployments;
2. M2M Subscriber Identity Module (“SIM”) management;
3. embedded SIM profile management systems;
4. device traceability;
5. security controls; and
6. M2M platform operations.

The rules also seek to support emerging digital ecosystems such as IoT deployments, industrial automation and connected devices.

PM-WANI framework

The Miscellaneous Services Rules incorporate PM-WANI within the statutory authorisation framework and establish obligations for app providers, aggregators and associated operators. These include:

1. user authentication requirements;

2. central registry compliance;
3. interface and interoperability requirements; and
4. privacy and security obligations.

In-flight, maritime and aeronautical services

Detailed provisions regulate telecommunications services provided on aircraft and vessels. Connectivity may be provided using satellite systems, wireless systems or direct-air-to-ground systems, subject to prescribed technical and operational safeguards.

The Miscellaneous Services Rules address:

1. aircraft and vessel connectivity arrangements;
2. agreements with access and internet service providers;
3. pilot and captain control over communications systems;
4. interception and monitoring obligations;
5. rollout requirements; and
6. security compliance.

For ADCS, the rules regulate aircraft ground data communication systems and prescribe rollout obligations, technical requirements and restrictions on interconnection with public networks.

Security and compliance

The Miscellaneous Services Rules incorporate stringent obligations relating to:

1. data localisation;
2. record retention;
3. monitoring facilities;
4. lawful interception;
5. trusted telecom products;
6. cybersecurity;
7. user verification; and
8. government inspection and audit rights.

The Central Government retains broad powers to issue directions, demand information and enforce compliance with security and operational requirements.

Captive Service Rules

The Captive Services Rules create a dedicated regulatory framework for private telecommunications networks used for internal organisational, industrial, enterprise and governmental purposes rather than for public telecommunications services.

Scope of services

The Captive Services Rules provide for 4 (four) categories of authorisations:

1. Captive Mobile Radio Trunking Services (“**CMRTS**”);
2. Captive Non-Public Networks (“**CNPNS**”);
3. Captive Very Small Aperture Terminal (“**Captive VSAT**”) services; and
4. captive general services.

Eligibility and application process

The eligible applicants include companies, government departments, courts, government-controlled entities and certain statutory bodies, subject to prescribed conditions. Applicants must generally satisfy FDI requirements, demonstrate an appropriate compliance record and have no outstanding government dues.

The applications are submitted through the designated portal and must be accompanied by prescribed processing fees, guarantees and auditor certifications, as applicable.

CMRTS

The rules establish a dedicated framework governing the provision of captive radio trunking networks and prescribe:

1. annual authorisation fees linked to user terminals;
2. spectrum-related requirements;
3. rollout obligations;
4. repeater station deployment requirements;
5. guarantees; and
6. monitoring obligations.

Certain Government and public safety users receive exemptions from specified financial requirements.

CNPNS

The CNPN framework permits enterprises to establish dedicated wireless private networks for internal communications and industrial operations.

The Captive Services Rules regulate:

1. use of assigned or leased spectrum;
2. operation within captive environments;
3. connectivity arrangements;
4. network deployment;
5. security requirements; and
6. restrictions on commercial provision of telecommunications services.

CNPN operators are generally prohibited from using captive networks as substitutes for public telecommunications networks.

Captive VSAT services

The Captive VSAT framework contains some of the most detailed provisions in the rules and governs the establishment, operation and expansion of satellite networks used for captive communications.

Key requirements include:

1. use of authorised satellite capacity;
2. Indian satellite earth station gateways;
3. routing of traffic through India-based gateways;
4. monitoring and interception facilities;
5. terminal registration requirements;
6. restrictions on interconnection;
7. domestic traffic localisation requirements; and
8. reporting of unauthorised access attempts.

The rules also permit international connectivity through authorised international private leased circuits, subject to prescribed safeguards.

Financial framework

The Captive Services Rules prescribe distinct fee structures depending on the category of captive service. While certain captive services are exempt from recurring authorisation fees, others attract processing fees, entry fees, terminal-based charges or guarantee requirements.

The rules also provide for quarterly payments, annual reconciliation processes, audits and reassessment mechanisms.

Operational, technical and security conditions

The Captive Services Rules impose detailed obligations concerning:

1. network deployment and operation;
2. compliance with notified technical standards;
3. record retention for at least six years;
4. localisation of network infrastructure and data;
5. trusted telecom products and sources;
6. restrictions on interconnection with public telecommunications networks;
7. remote access controls;
8. lawful interception and monitoring systems; and
9. reporting of security incidents.

Additional safeguards apply to satellite networks, monitoring systems and remote access arrangements involving locations outside India.

Government oversight and enforcement

The Captive Services Rules empower the Central Government to conduct inspections, audits and assessments, call for information, issue operational directions and recover unpaid dues. Non-compliance may result in suspension, curtailment or revocation of authorisations.

Migration Rules

The Migration Rules establish the framework and procedure for migration of existing licences, registrations and permissions granted under the earlier regime to the corresponding authorisations issued under the Telecom Act. The Migration Rules are intended to facilitate an orderly transition to the new authorisation framework while preserving existing rights, obligations and regulatory compliance requirements.

Scope and eligibility

The Migration Rules apply to existing licensees seeking migration to authorisations granted under:

1. the Principal Services Rules;
2. the Miscellaneous Services Rules;
3. the Captive Services Rules; and
4. the Telecommunications (Authorisation for Telecommunication Network) Rules, 2026.

Although the Migration Rules provide a pathway for transition to the new regime, migration is not structured as an immediate mandatory exercise upon notification of the rules. Instead, migration timelines are linked to licence validity periods, and existing licence holders may continue operating under their licences pending migration and, in certain circumstances, until approval or rejection of the migration application. A licensee may apply for migration only if it continues to satisfy the eligibility requirements prescribed for the corresponding authorisation under the applicable authorisation rules.

Migration application process

A licensee seeking migration is required to submit an application through the designated portal in the prescribed form and manner, accompanied by supporting documentation and payment of the non-refundable processing fee applicable to the corresponding authorisation. Applicants can now submit their applications online through the 'Telecom eServices Portal'.

The application is subject to several conditions, including:

1. the scope and service area or network area of the relevant authorisation must encompass the scope and service area or network area covered by the existing licence;
2. NSO licensees must migrate to the corresponding NSO authorisation;
3. VNO licensees must migrate to the corresponding VNO authorisation; and
4. holders of PMRTS licences are required to migrate to the PMRTS authorisation under the Miscellaneous Services Rules.

Where a licensee holds an overlapping authorisation, it is required to relinquish such overlapping authorisation as part of the migration process.

Migration timelines

The Migration Rules prescribe specific timelines for migration applications.

For licences without a defined validity period, applications are required to be submitted at least 12 (twelve) months prior to expiry of the 5 (five) year period specified under Section 3(6) of the Telecom Act. Section 3(6) of the Telecom Act allows existing telecom license, registration, or permission holders to seamlessly transition to the new authorization regime. It guarantees that providers can either continue operating under their current terms and conditions for the remainder of their validity period or voluntarily migrate to the newly established authorisation framework.

However, where less than 12 (twelve) months of validity remained as of the notification date of the rules, applications must be filed within 90 (ninety) days of notification or before licence expiry, whichever occurs earlier.

The Central Government may permit delayed applications on payment of prescribed late fees where sufficient cause is shown, provided the application is submitted before licence expiry.

Approval and Letter of Intent framework

Upon examination of a migration application, the Central Government may issue a Letter of Intent (“**LoI**”) specifying the conditions to be fulfilled before migration is approved. These conditions may include:

1. migration of all licences fully covered by the proposed authorisation;
2. submission of unconditional and irrevocable undertakings regarding outstanding dues;
3. payment of any differential entry fee between the existing licence and proposed authorisation;
4. furnishing additional guarantees where the guarantee requirement under the new authorisation exceeds that applicable under the existing licence; and
5. relinquishment of overlapping authorisations from the effective migration date.

Upon compliance with the conditions specified in the LoI, the Central Government may approve the migration through the portal, specifying the relevant service or network, service area or network area, and the effective date and duration of migration.

Financial treatment of existing licensees

The Migration Rules provide a mechanism for aligning entry fees and guarantee requirements between the old and new regulatory frameworks.

Where the entry fees or guarantees previously furnished under existing licences are lower than those prescribed under the corresponding authorisation, the applicant must pay the difference or furnish additional security, as applicable.

Conversely, where the aggregate entry fees or guarantees already furnished under the existing licences exceed those prescribed under the new authorisation, the applicant is not entitled to any refund of entry fees or reduction of guarantees.

Continuity of rights, obligations and resources

One of the most significant features of the Migration Rules is the express preservation of existing rights and liabilities following migration. Migration does not extinguish or affect:

1. rollout obligations;

2. outstanding financial liabilities;
3. determinations of violations;
4. penalties and enforcement actions; or
5. any other obligations associated with the original licence or relinquished authorisation.

The rules also provide continuity for resources and permissions already granted by the Government, including:

1. telecommunications identifiers;
2. spectrum assignments;
3. compliance certificates;
4. rollout-related approvals and certifications;
5. security clearances;
6. foreign personnel deployment approvals;
7. remote access permissions; and
8. gateway permissions,

unless otherwise determined by the Central Government in the public interest.

Accordingly, migration primarily changes the regulatory instrument governing the service and does not require operators to re-obtain existing operational approvals and resources.

Digital implementation

The Migration Rules envisage a fully digital migration framework and empower the Central Government to notify one or more portals for publication of forms, procedures, directions and guidelines and for processing migration applications.

Conclusion

The Principal Services Rules, Miscellaneous Services Rules, Captive Services Rules and Migration Rules collectively constitute the core implementation framework under the Telecom Act. Together, they replace the previous licence based regime with a unified authorisation architecture covering public telecommunications services, specialised telecommunications services, captive networks and the migration of existing licensees.

From a regulatory perspective, the new framework appears to be aimed at reducing fragmentation and simplifying market entry by consolidating multiple licences, registrations and permissions into a more streamlined authorisation structure. The introduction of a unified digital application and compliance framework, coupled with the launch of the DoT's authorisation portal, is also intended to facilitate online applications for new authorisations and migration of existing licensees through a single window mechanism.

The rules also provide greater clarity regarding the regulatory treatment of specialised services, including satellite communications, M2M services, captive networks, PM-WANI services and VNOs. At the same time, the framework clarifies that authorisation and spectrum assignment are distinct regulatory approvals. In particular, satellite network operators, earth station operators and very small aperture terminal service providers may obtain the relevant authorisation under the new framework, but are still required to obtain separate spectrum assignments and other applicable governmental approvals in accordance with the Telecom Act and related regulatory requirements.

From a compliance and commercial standpoint, the rules appear to rationalise certain aspects of the previous framework by reducing overlaps between licence categories, providing a common procedural structure and creating a dedicated framework for migration of existing licensees. Industry commentary has also noted that the new

framework is intended to improve ease of doing business and accommodate evolving technologies, while enabling participation by specialised players such as virtual network operators. However, the extent to which this translates into a meaningful reduction in compliance costs will depend on how the detailed authorisation conditions are implemented in practice.

While some service categories may benefit from clearer eligibility criteria and a more rationalised structure, the new regime continues to impose significant regulatory obligations, including minimum net worth requirements, entry fees, bank guarantees, AGR linked authorisation fees for certain services, extensive reporting requirements, lawful interception obligations, data localisation requirements, deployment of trusted telecom products and enhanced cybersecurity and anti-fraud measures. The rules therefore represent a simplification of the regulatory architecture rather than a wholesale deregulation of the sector.

For existing operators, the Migration Rules are particularly significant as they provide a structured pathway for transition to the new framework while preserving existing rights, obligations, approvals, spectrum assignments, telecom identifiers, rollout commitments and pending liabilities. Importantly, migration does not extinguish historical obligations or provide a clean regulatory slate, thereby ensuring continuity while facilitating the shift to the new regime. At the same time, some stakeholders may continue to seek greater clarity on the operation of legacy frameworks, treatment of existing registrations and licences, and the practical implications of migrating to a statutory authorisation model.

Overall, the new framework represents one of the most significant telecommunications reforms in recent years. By replacing a complex and often fragmented licensing structure with a unified authorisation regime, the DoT has sought to create a more technology neutral, digitally administered and future-ready regulatory framework. The long-term success of these reforms will, however, depend on the practical implementation of the authorisation conditions, the migration process, spectrum assignment policies and the manner in which compliance obligations are administered under the new regime.

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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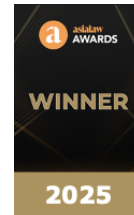
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