

Regulatory Regime for Miscellaneous Telecom Services Gains Momentum

DoT Notifies Final Rules

30 June 2026

On 23 June 2026, the Department of Telecommunications (DoT) notified the Telecommunications (Authorisation for Provision of Miscellaneous Telecommunication Services) Rules, 2026 (Rules). The Rules (with notable revisions) follow the previously published draft rules (Draft Rules), which were released in September 2025 for stakeholder feedback (please see [here](#) for our update on Draft Rules).

The Rules form part of the broader scheme of transition to the service authorisation regime under the Telecommunications Act, 2023 (Act), and prescribe the terms and conditions for miscellaneous telecom services, namely, enterprise communication services (ECS), machine-to-machine (M2M) services, public mobile radio trunking services (PMRTS), Prime Minister Wi-Fi Access Network Interface (PM-WANI) services, in-flight and maritime connectivity (IFMC) services, and aeronautical data communication (ADC) services.

Notably, the Draft Rules contemplated an additional authorisation, namely, *International SIM service authorisation*, which has now been omitted from the scope of the Rules. Instead, it appears that DoT is continuing to accept No Objection Certificates under the 2022 regime for international SIM services in India.

This update highlights the key features of the Rules and compares the key changes (from the Draft Rules) that are likely to have a business impact.

Key Features

1. ***ECS authorisation***: The scope contemplates offering of 4 (four) services to enterprise users, namely, *audio conferencing, audiotex, voice mail, and cloud-based Electronic Private Automatic Branch Exchange (EPABX)*. While the Rules do not strictly (or granularly) spell out the scope for each in-scope service (and stakeholders ought to be required to carefully assess applicability), they provide guidance on DoT's intention to cover the providers / vendors who offer enterprise communication solutions on a commercial basis.

Further, the Rules retain safeguards against bypass, and require the authorised entity to retain certain records of its users for at least 1 (one) year. Separately, the Rules restrict interconnection of calls originating from public switched telephone network (PSTN), public land mobile network (PLMN) or internet telephony networks, with private networks by an audio conferencing system. Additionally, point-to-point conferencing services can only be provided to enterprises registered in India, subject to the calls being originated, terminated, routed and switched in India and the relevant telecommunication identifiers being assigned by the authorised entity or licensee.

Interestingly, for cloud-based EPABX, the authorised entity may establish connectivity between the user and EPABX through 'internet connectivity' or a 'domestic leased circuit' obtained from an eligible authorised entity or licensee. Additionally, such entity must ensure a logical partitioning between the "components of the platform handling telecommunication resources of different users", and the logs of such partitioning should be maintained for at least 2 (two) years.

2. ***M2M services authorisation***: The M2M services authorisation appears to have been streamlined and simplified, with no authorisation fee, entry fee or guarantee payable, encouraging market entry.

However, a nominal fee of INR 10,000 is payable as a processing fee. For existing M2M registrants, it will be important to assess the applicable migration timelines and conditions. For new participants, authorisation may be granted without a prior letter of intent, reducing administrative waiting periods.

Further, the Rules add 2 (two) important compliance obligations. An authorised entity is required to (a) intimate details of a use case to the government, prior to commencement of each such use case of M2M services to users, and (b) maintain and update “an online supply chain management system of M2M subscriber identity module” (including its movement from authorised entity to the users).

3. PMRTS authorisation: The scope of PMRTS, as prescribed in the final Rules, closely aligns with the Draft Rules; however, the references to “base station” have been replaced with “repeater station”. Separately, the financial conditions introduce a specific reference to ‘spectrum charges linked to adjusted gross revenue’, payable if the authorised entity acquires the right to use of spectrum. These spectrum charges are also one of the components relevant to the calculation of the guarantee.
4. PM-WANI, IFMC, and ADC: The Rules also provide the terms and conditions for other miscellaneous services, including PM-WANI, IFMC and ADC. PM-WANI carries no authorisation fee, while IFMC and ADC are subject to nominal annual authorisation fee treatment. Notably, entities authorised to provide (a) access service in all 22 (twenty-two) service areas, or (b) internet service in national service area, are exempted from obtaining IFMC service authorisation.
5. Maintenance of records: The Rules introduce a stricter requirement – the authorised entity must maintain records of all operations and command logs in such manner as to enable the government (or the designated agency) to have access on *real-time basis* for at least 12 (twelve) months, and on *non-real time basis* for the next 24 (twenty-four) months.
6. Other conditions applicable to all miscellaneous services: Other generally applicable conditions, including duration, audit and inspection, data localisation, network-system location, user-information localisation and security obligations, broadly mirror the principal and captive authorisation frameworks, subject to service-specific variations.

Comments

The Rules finalise the regulatory authorisation regime for miscellaneous telecommunication services. From a scope perspective, the Rules largely align with the Draft Rules and retain all the service authorisations, except for the International SIM services authorisation.

Given the early stage, where the Rules are transitioning to implementation, stakeholders must maintain a cautious and vigilant watch. Key preparations that would have been made considering the Draft Rules, including mapping of obligations, migration strategies and vendor contracts, may now need to be reconsidered through a fresh lens.

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