

# DoT clarification of 'International' and 'Domestic' SMS:

Key takeaways for telcos, telemarketers, enterprises and OTTs

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In the present digitally connected era, messages sent through 'Short Message Service' (SMS messages) are heavily relied upon for personal, transactional and commercial communications. SMS messages, along with other modes of communication such as voice calls, emails, Over-The-Top (OTT) and Rich Communication Service (RCS) messaging are bridging connectivity gaps across international boundaries for enabling communications for individuals and enterprises. However, despite the increasing reliance on SMS communications, there was still lack of regulatory clarity on the definitions of 'Domestic SMS' and 'International SMS'.

These definitions of 'Domestic SMS' and 'International SMS' are critical for pricing of messages, accurate classification of traffic for complying with applicable regulatory obligations, enforcement of security conditions, and ensuring correct routing specifically for time-sensitive messages like One-Time Passwords (OTPs) or bank transaction notifications.

Accordingly, following a reference from the Department of Telecommunications (DoT), the Telecom Regulatory Authority of India (TRAI) initiated a stakeholder consultation and issued recommendations on the definitions of 'Domestic SMS' and 'International SMS'. The recommendations were finally adopted by DoT and accordingly notified through an Official Memorandum dated 19 June 2025.

## Salient features of the DoT notification

- Definition of 'Domestic SMS' and 'Domestic Traffic': Any SMS delivered using domestic traffic would be classified as a 'Domestic SMS'. For clarity, domestic traffic means the traffic originating and terminating within India. In simple terms, domestic SMS refers to such SMS message which entirely stays within India, with physical routing through domestic networks only and the origin / destination of the SMS message being within India.
- Definition of 'International SMS' and 'International Traffic': International SMS refers to an SMS delivered using international traffic. For clarity, international traffic means the traffic originating in one country and terminating in another country, where one of the countries is India. In other words, for an SMS to qualify as an 'International SMS', it has to either originate or terminate in India, and the other leg can be outside India. Additionally, any incoming 'application-to-person' (A2P) SMS message, such as banking alerts or e-commerce updates, would be considered as an international SMS, if its generation, transmission or reception takes place outside India.
- Clarification on routing: The notification mandates that all outgoing 'International SMS' must be routed through an International Long Distance (ILD) gateway. Further, in case of Indian telemarketers who wish to deliver A2P messages to Telecommunications Service Providers (TSPs), such SMS should not be routed through an ILD gateway and must remain within the domestic network. However, all incoming 'International SMS' (whether A2P or person-to-person) that originate in the network of foreign carriers, should be routed through the ILD gateway for transmission to TSPs in India.

## How does it impact relevant stakeholders?

The DoT notification provides much needed clarity to the telecom industry on the meaning and regulatory treatment of international and domestic SMS. All telecom operators in India should assess their SMS messaging infrastructure and ensure that it is compliant with the routing mandates prescribed by DoT and SMS is appropriately classified to ensure fair tariffs. Telemarketers and SMS aggregators need to ensure that domestic A2P messages are not transmitted through ILD gateway under any circumstance, and if such SMS is originated or generated from outside India, it will be considered as an international SMS. Telemarketers should vet their enterprise customers to determine the location of origination / generation of the SMS, specifically whether any part of its transmission is through a location outside India and revisit their pricing models accordingly. While this update may not directly impact OTT communication platforms (since they deliver messages over the internet and not as a traditional SMS), the notification and routing rules would be relevant in case such OTT platforms trigger an SMS message as a fallback option or for sending OTPs to users that are not registered on their platform.

Therefore, it would be crucial for all relevant stakeholders to audit their message origination and transmission paths in order to achieve compliance. It will also be interesting to see whether this update will result in localisation of messaging infrastructure to avoid high international SMS charges.

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