

Abdul Hakeem

Do you have any comments on the proposed statutory instrument set out in this notice?

Dear Sirs,

The explicit definition of a 'single user' may be manipulated by the MNOs in a way to circumvent any regulatory amendment made by OFCOM for various reasons:

- a. In a scenario where there are multiple Home/Office workers within the same building, how does a single user prove that he/she is not connected with a COMUG ?
- b. Without providing a scope and unfettered usage parameters, the MNO's would still find an avenue to restrict the simcards of COSUGs identified within the network through the IMEI and curb services for obvious reasons.
- c. In countries like France, Holland etc the lines between COSUG and COMUG is blurred, everyone enjoy the same benefits.
- d. The definition of a single user would also be frayed if a couple choose to access their individual simcards by routing calls through a voip client on their smartphones to be terminated on a gateway with 2 simards, one for each. In this scenario, a family with 2 simcards on a single gateway are no longer classified as a single user if identified by the MNOs.
- e. Another scenario is a single user with 2 or more simcards hoping to take advantage of free on-Net calls in different times of the day. For instane a single user purchased 2 simcards from the same MNO, one simcard gives free on_Net in 7:AM to 7PM, while the other simcard gives free on-Net calls between 7PM to 7AM, Weekends and Bank Holiday.

some of the legitimate usage scenarios cannot be constrained under the 'single user' parameter, it needs to be broadened beyond the single 'simcard' usage entity or at least defined in the regulations that a single user does not constitute 'single simcard'

Respectfully submitted,
Abdul Hakeem