



Consultation response form

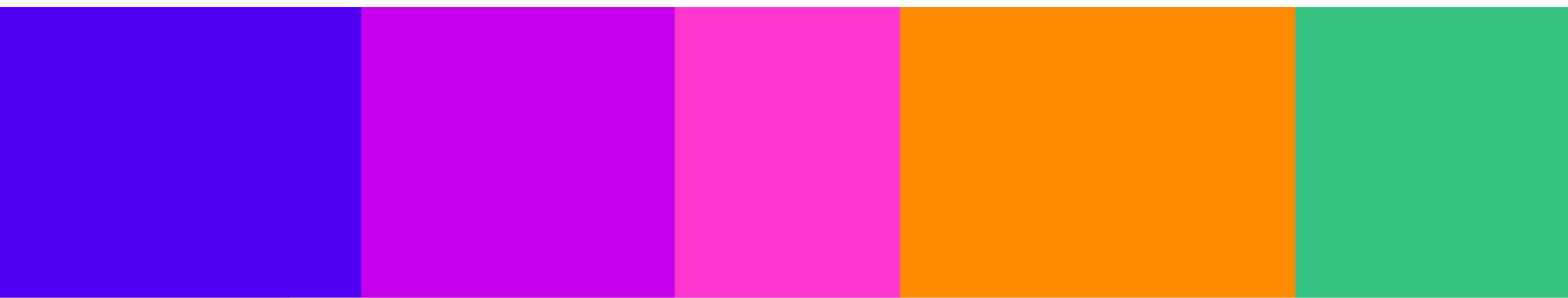
Please complete this form in full and return to globaltitles@ofcom.org.uk

Consultation title	Consultation: Global Titles and Mobile Network Security
Full name	
Contact phone number	
Representing (delete as appropriate)	Self / Organisation
Organisation name	3G Telecommunications Limited
Email address	

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Whole response
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	In this version, none as already adjusted
For confidential responses, can Ofcom publish a reference to the contents of your response?	No



Your response

Question	Your response
<p>Question 1: Do you agree with our proposal to ban GT leasing to third parties? If not, please explain your reasons including how you would prevent malicious signalling by lessees.</p>	<p>No I do not agree with your proposal to ban GT leasing.</p> <p>We are part of the SS7 ecosystem and rely on using leased GTs to perform our service at hlrlookup.com. Under your list of use cases you do not specifically list but we may come under "Authentication Services".</p> <p>We are a small UK SME. If OFCOM ban GT leasing in the UK then OFCOM would purposely negatively affect my small business as we rely on leasing of GTs to perform our business.</p> <p>We assist SMEs in detecting fraudulent signups to their websites by highlighting if a mobile telephone number is real/not real.</p> <p>By banning GT leasing, if we are unable to perform our service, this will cause potential harm to UK SMEs.</p> <p>We must have SS7 access to perform our HLR lookup, and to receive responses over SS7 we must have a Global Title which routes to our service. There is currently no viable alternative as our GT lessor provider does not have the ability to provide the same service via API.</p> <p>We provide services for aggregators to detect when telephone numbers have ported, which network they have ported to (for least cost routing) and if the destination MSISDN is live/not live allocated/not allocated. This service is crucial for reducing the cost of sending SMS for A2P providers.</p> <p>We also provide a service when a company with existing datasets can check if the mobile telephone numbers they hold are still active. This is a crucial part of GDPR compliance as the customer can detect when an assigned MSISDN has become unassigned and our customer can remove or flag the MSISDN in their database as "gone away". If the MSISDN is reassigned to a new user, then our customer knows not to send SMS to the MSISDN any more and can avoid sending personally identifiable information over SMS to a third party.</p>

Question	Your response
	<p>Via resellers of ours, we supply the HLR lookup service to HMRC at Hmrc.gov.uk where every MSISDN that is entered into HMRC.gov.uk website is verified to be real and active and assigned to a subscriber.</p> <p>Our service has provided the HLR Lookup service to help mitigate fraud to HSBC, Barclays, Tesco plus many more UK companies.</p> <p>We applied to OFCOM for a numbering range so that we can have our own GTs so that we do not have to lease them. OFCOM denied our application citing that "Ofcom places particular emphasis on whether an applicant can demonstrate that it will be able to use that MNC/Mobile number in providing Mobile Services in the UK."</p> <p>If OFCOM are unwilling to allow us to have our own mobile number range because we are not an MNO, then there is no alternative for us to have access to the SS7 network except via leased Global Titles.</p> <p>To prevent malicious signalling by lesees the lessor can add into their Letter Of Authority that the Lessee can only use the GTs for a limited use case. For example that the lessee can only use the GT for FS.11 Category 1 packets. This can be implemented by the interconnecting SCCP carrier.</p> <p>The lessor could also require routing via the lessor and filter traffic themselves.</p> <p>Banning leasing GTs is akin to banning leasing of cars because some people used the car in a robbery.</p>
<p>Question 2: Do you agree with our proposal to only include exemptions to our ban on GT leasing re-lating to intra-group and supplier use? If you consider that any other exemptions are necessary, please explain how these exemptions could be limited to prevent malicious signalling by lessees.</p>	<p>No I don't agree to this. I think that HLR Lookup should have an exemption because we rely on GT leasing to be able to perform our business (see answer 1 above).</p> <p>To prevent malicious signalling by lessees the lessor can stipulate that the GT can only be used for SRIforSM (HLR Lookup) and filter other traffic.</p>

Question	Your response
<p>Question 3: Do you agree with our proposal to ban the creation of GTs from sub-allocated numbers by third parties?</p>	<p>No</p>
<p>Question 4: Do you agree with our proposals to strengthen our rules to prohibit the misuse of GTs by operators that hold UK mobile numbers and to provide supplementary guidance on the types of steps range holders are expected to take when providing a service to a customer (using a GT as an input) that has the potential to generate malicious signalling?</p>	
<p>Question 5: Do you agree with our proposal to strengthen our rules to prohibit the creation of GTs from numbers not allocated for use?</p>	<p>Yes</p>
<p>Question 6: Do you agree with the proposed implementation period?</p>	<p>No</p>
<p>Question 7: Do you agree with our provisional impact assessment?</p>	<p>No.</p> <p>I think that the impact to my company, as a lessee, is more than you think. Our existing suppliers do not have existing APIs to provide to us.</p> <p>People who are performing malicious signalling will move to different methods which will be more hidden than their current methods</p>
<p>Question 8: Do you agree with our proposed changes to the General Conditions of Entitlement, National Telephone Numbering Plan and Numbering Condition Binding Non-Providers?</p>	<p>Confidential? – Y / N</p>

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