

Bluewave communications is a fully licensed Mobile Network Operator as part of the aql group. We welcome and support the proposal by Ofcom for strengthening of governance relating to Global Title usage. We believe this will reduce the number of grey routes and greatly increase the accountability and traceability of communications by Operators.

Organisation - Bluewave Communications Ltd

Not confidential.

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.

Yes

Question 2: Do you agree with our proposal to only include exemptions to our ban on GT leasing relating 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.

Yes

Question 3: Do you agree with our proposal to ban the creation of GTs from sub-allocated numbers by third parties?

Yes - with the exception of edge cases where prior discussion and approval via Ofcom (such as innovation, testing of new technologies).

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?

Yes

Question 5: Do you agree with our proposal to strengthen our rules to prohibit the creation of GTs from numbers not allocated for use?

Yes

Question 6: Do you agree with the proposed implementation period?

Yes

Question 7: Do you agree with our provisional impact assessment?

Yes

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?

Yes