

Consultation response form

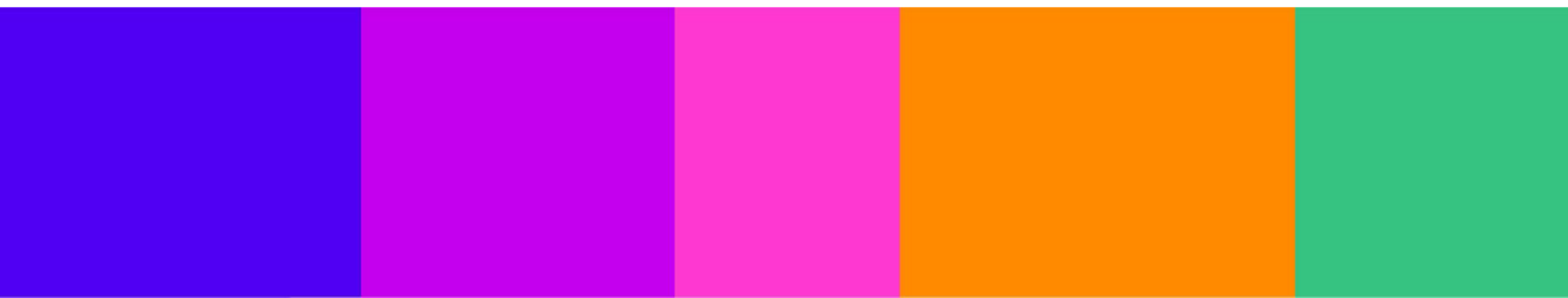
Please complete this form in full and return to globaltitles@ofcom.org.uk

Consultation title	Consultation: Global Titles and Mobile Network Security
Full name	[REDACTED]
Contact phone number	[REDACTED]
Representing (delete as appropriate)	Federation of Communications Services (FCS)
Organisation name	Federation of Communications Services (FCS)
Email address	[REDACTED]

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.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes



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>Confidential? N</p> <p>We agree with Ofcom proposal to ban GT leasing to third parties.</p> <p>We consider that the measures will help to protect users of mobile services and suggest that Ofcom implements them as speedily as possible.</p>
<p>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.</p>	<p>Confidential? N</p> <p>We agree with the proposals.</p>
<p>Question 3: Do you agree with our proposal to ban the creation of GTs from sub-allocated numbers by third parties?</p>	<p>Confidential? N</p> <p>We agree with the proposal.</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>Confidential? N</p> <p>We agree with the proposal.</p>

Question	Your response
<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>Confidential? N</p> <p>We agree with the proposal.</p>
<p>Question 6: Do you agree with the proposed implementation period?</p>	<p>Confidential? N</p> <p>We note that Ofcom will have to make changes to the GCs, and we suggest the Ofcom implements them as soon as possible. The GSMA code already recommends that GTs should not be leased to third parties so legitimate providers should already have resolved any issues. We would welcome Ofcom bringing forward the implementation date where possible so that all consumers benefit from the protection at the earliest possible opportunity.</p>
<p>Question 7: Do you agree with our provisional impact assessment?</p>	<p>Confidential? N</p> <p>We agree.</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? N</p> <p>We agree with the proposals and consider that they should be sufficient to prevent sharing of GT.</p>

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