

Jersey Airtel Limited's (JAL) response to Ofcom regarding consultation "Global Titles and Mobile Network Security" date 22-Jul-24.

Via email to: globaltitles@ofcom.org.uk; Cc: jessal.visavadia@ofcom.org.uk

Consultation 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.

Response:

As a small mobile network operator, GT leasing is a vital part of our revenue model. We understand the security concerns related to GT misuse; however, a complete ban on leasing could severely impact our business viability. Refer the table below.

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]			

Alternative Solution:

Instead of a full ban, we propose introducing a strict regulatory framework for leasing those mandates monitoring and security protocols, such as implementing SS7 firewalls, strictly adhering GT leasing code of practices and regular audits of lessees. This would mitigate malicious signalling while allowing legitimate use of GT leasing to continue.

Consultation 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.

Response:

We support the proposal to allow intra-group and supplier use, but we recommend considering an exemption for MVNOs, Penetration Testing and A2P services with proven security measures.

Alternative Solution:

By applying stringent monitoring, following GSMA CoP and due diligence processes, these third parties could be allowed to lease GTs under a regulated framework.

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

Response:

While we understand the need for control, banning the creation of GTs from sub-allocated numbers will limit flexibility, especially for smaller operators who rely on sub-allocation.

Alternative Solution:

We propose creating a traceability framework that requires detailed reporting and monitoring of sub-allocated GTs to ensure security without a complete ban.

Consultation 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?

Response:

Strengthening the rules is essential to prevent misuse. However, smaller operators like us may struggle with the financial and technical burdens of compliance.

Alternative Solution:

A tiered compliance system based on operator size could be introduced, ensuring proportional security measures that are affordable for smaller operators like us while maintaining robust protections.

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

We agree that creating GTs from unallocated numbers should be prohibited as it poses significant security risks. However, the enforcement mechanism needs to be clear and consistently applied across all operators.

Consultation question 6: Do you agree with the proposed implementation period?**Response:**

Whilst the response to consultation question 1 is our preference, however, the proposed timeline (January 2026) is extremely challenging, especially for a small operator like us who may require more time to restructure their business models, explore alternate solutions and migrate clients away from GT leasing.

Alternative Solution:

We recommend extending the implementation period to at least end of 2028 to allow for smoother transitions and for small operator like us to explore alternative revenue streams and processes.

Consultation question 7: Do you agree with our provisional impact assessment?**Response:**

As a small mobile network operator, we acknowledge that the provisional impact assessment conducted by Ofcom recognizes the potential risks and harms posed by the misuse of Global Titles (GTs), particularly related to security vulnerabilities in signalling. However, we believe that the assessment **underestimates the financial, operational, and strategic impacts** on smaller operators like us, especially given our reliance on GT leasing as a critical revenue stream.

Key Concerns Regarding the Impact Assessment:

1. **Overreliance on GT Leasing for Small Operators:** The provisional impact assessment suggests that operators affected by the proposed ban on GT leasing will be able to transition smoothly to alternative business models. However, for small operators in small markets, like ours, GT leasing is a crucial component of sustaining business viability.
 - o **Example:** In smaller markets (like the Jersey market where we operate), revenue from GT leasing supports not only operational costs but also infrastructure investments. Losing this revenue would disproportionately affect smaller players who don't have the same economies of scale as larger operators.
 - o **Impact:** This would lead to reduced competitiveness, potential layoffs, and limited future investments in expanding network capabilities, directly impacting our ability to serve customers.

Consultation 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?

Response:

As a small mobile network operator, we acknowledge the need to revise the General Conditions of Entitlement, National Telephone Numbering Plan, and Numbering Condition Binding Non-Providers to address the misuse of Global Titles (GTs) and improve network security. However, we have concerns about how these changes will affect smaller operators like us, who rely on GT leasing and have limited resources to implement the necessary adjustments.

Recommendations:

1. **Proportional Regulation for Small Operators:** Ofcom should consider implementing **tiered or scaled requirements** in the General Conditions of Entitlement, NTNP, and NCBNP based on the size and operational scope of the operator. This will ensure that smaller operators are not overwhelmed by compliance burdens designed for larger operators.
2. **Financial and Technical Support:** To assist small operators in meeting the new requirements, Ofcom could provide **grants, subsidies, or access to shared technical resources** (such as monitoring and compliance tools). This would lower the cost of compliance and enable smaller operators to maintain security standards.
3. **Flexible Implementation Timeline:** Given the operational and financial challenges smaller operators face, the implementation timeline for these changes should be extended to allow adequate time to transition, especially for operators heavily reliant on GT leasing and third-party partnerships.

Jersey Airtel Limited
15th October 2024