

# Consultation response form

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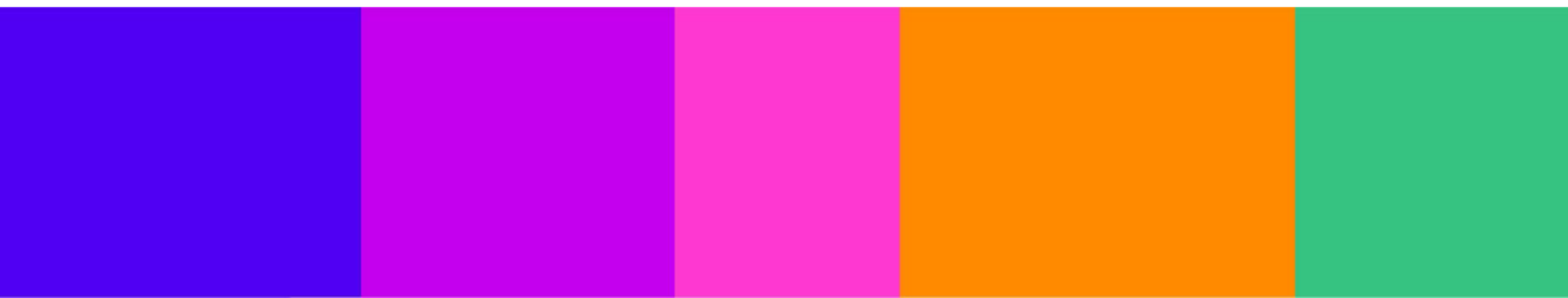
Please complete this form in full and return to [globaltitles@ofcom.org.uk](mailto:globaltitles@ofcom.org.uk)

<b>Consultation title</b>	Consultation: Global Titles and Mobile Network Security
<b>Full name</b>	[REDACTED]
<b>Contact phone number</b>	[REDACTED]
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Manx Telecom
<b>Email address</b>	[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](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	No
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes



## Your response

Question	Your response
<p><b>Question 1:</b> 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 the difficulties highlighted in preventing malicious use, we think that an immediate ban might cause disruption to Operators' current business models and strategies that are already in motion within the MNO's and child-entities.</p>
<p><b>Question 2:</b> 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>Exemptions for intra-group and supplier use are welcomed. We have discussed items with OFCOM that Manx Telecom would like to explore flexibility on and would value further discussions. Without confirmation from Ofcom that specific GT Modification solutions are acceptable as possible workarounds, then Manx Telecom might face difficulties with third party contracts.</p>
<p><b>Question 3:</b> 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 support this, since we don't believe that we have ever allocated number ranges to 3<sup>rd</sup> parties, who have then gone on to created GTs from them.</p>
<p><b>Question 4:</b> 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>Yes – we agree that this is the correct thing to do, in order to prevent malicious or fraudulent use of a network that was deemed to be inherently secure and trusted.</p>
<p><b>Question 5:</b> 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 this, although not aware of any instances of this on our network. We could not support this situation on our network without specifically routing GT address on our STPs and understanding the use case.</p>

Question	Your response
<p><b>Question 6:</b> Do you agree with the proposed implementation period?</p>	<p>Confidential? – N</p> <p>The timeline for consultation is reasonable. However, if a ban was to be enforced, we need to ensure that sufficient time is given to implement effective work-arounds, or to close down services (which would not be desirable). Please also see the comments on impact on business models.</p>
<p><b>Question 7:</b> Do you agree with our provisional impact assessment?</p>	<p>Confidential? – N</p> <p>Not fully, and we would value more dialogue – from our perspective, so long as processing functionality can be utilised for specific scenarios, then we have alternative options to support existing business models, whilst maintaining the integrity and security of the UK GT utilisation.</p>
<p><b>Question 8:</b> 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>Combined with the above, we do not see an issue.</p>

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