

Consultation response form

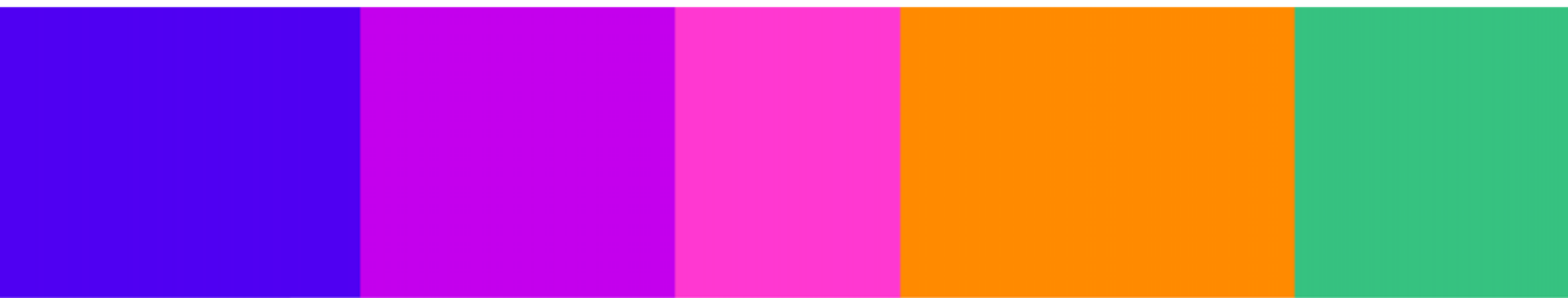
Please complete this form in full and return to globaltitles@ofcom.org.uk

Consultation title	Consultation: Global Titles and Mobile Network Security
Full name	[REDACTED]
Contact phone number	[REDACTED]
Representing (delete as appropriate)	Organisation
Organisation name	MVNO Europe
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? – Y N</p> <p>Having studied Ofcom’s consultation document entitled “Global Titles and Mobile Network Security, Proposals to address misuse of Global Titles”, MVNO Europe (http://mvnoeurope.eu/members/) understands the concerns expressed by Ofcom with regard to potential serious misuse of leased Global Titles (hereafter ‘GTs’).</p> <p>MVNO Europe does not consider that the use of GTs by Mobile Virtual Network Operators (MVNOs) represents a risk factor in this regard.</p> <p>This is the case because MVNOs operate on the basis of extensive formal contracts signed with the United Kingdom’s four Mobile Network Operators (MNOs), which concern an intricate set of wholesale services and the modalities of technical integration requirements between a Host MNO and an MVNO (including providers of Internet of Things services), rather than the mere lease of GTs. The same holds true where the MVNO acts as an MVNO Enabler (MVNE) or Aggregator (MVNA) towards downstream service providers.</p> <p>In fact, MVNO Europe does not consider that the provision of GTs, as part of MVNO/MVNE/MVNA relationships, constitutes a lease; it is rather one element encompassed in a complex and wide-ranging wholesale contract.</p> <p>On the basis of the above, MVNO Europe asks Ofcom to clarify in its final Statement and decision instruments that MVNO/MVNE/MVNA relationships do not constitute a lease, and therefore that existing arrangements will not be affected.</p> <p>In case Ofcom would nevertheless consider that the provision of GTs, as part of MVNO/MVNE/MVNA relationships, is to be considered a lease, MVNO Europe appeals to Ofcom to explicitly carve out these relationships from the proposed ban in its final Statement and decision instruments. MVNO Europe puts forward proposed wording in response to Question 8 below.</p> <p>Should Ofcom not wish to proceed in this manner, MVNO Europe asks Ofcom to address potential malicious use of GTs through less severe measures than an outright ban,</p>

Question	Your response
	<p>whilst bearing in mind that this should be done without disrupting existing MVNO/MVNE/MVNA relationships and without unduly raising technical complexity and costs for industry.</p> <p>More generally, MVNO Europe considers that the measures identified in the GSMA Code of Conduct and summarised by Ofcom in section 2.25 of the consultation document are adequate to address potential misuse of GTs.</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? – Y N</p> <p>Please see MVNO Europe’s response to Question 1.</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? – Y N</p> <p>MVNO Europe agrees with Ofcom’s proposal to ban the creation of GTs by third parties from sub-allocated numbers.</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? – Y N</p> <p>Whilst not having investigated these proposals in full detail, MVNO Europe asks Ofcom to bear in mind that this should be done without disrupting existing MVNO/MVNE/MVNA relationships and without unduly raising technical complexity and costs for industry.</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>Confidential? – Y N</p> <p>MVNO Europe agrees with Ofcom’s proposal to prohibit the creation of GTs from numbers that are not allocated. This make makes perfect sense.</p>

Question	Your response
<p>Question 6: Do you agree with the proposed implementation period?</p>	<p>Confidential? – Y N Please see our response to Question 1.</p>
<p>Question 7: Do you agree with our provisional impact assessment?</p>	<p>Confidential? – Y N Please see our response to Question 1.</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 In line with our response to Question 1, in order to carve out MVNO/MVNE/MVNA relationships, MVNO Europe suggests that a third exception be added to B3.8.2 of the National Telephone Numbering Plan being proposed by Ofcom. The exception would read as follows:</p> <ul style="list-style-type: none"> c) a person acting as a mobile virtual network operator, mobile virtual network enabler, or mobile virtual network aggregator, provided that the Telephone Number used as a Global Title is not used for any other purpose.

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