

Consultation response form

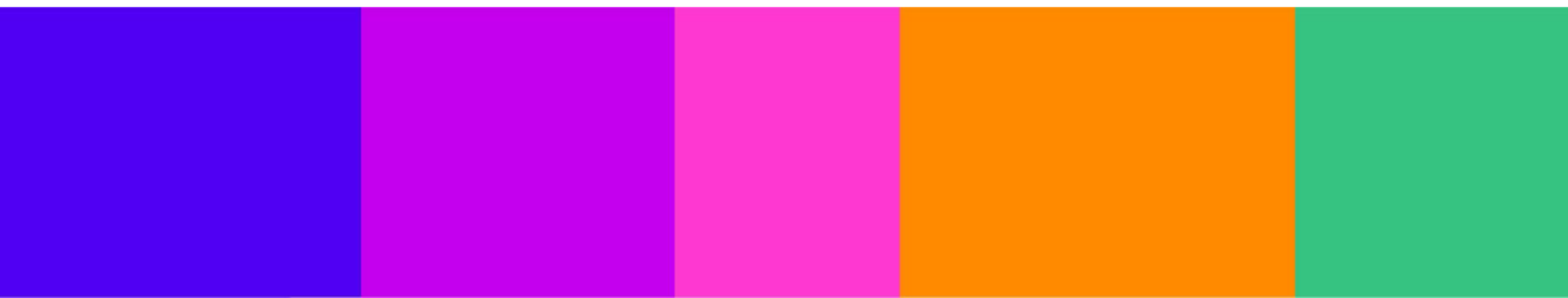
Please complete this form in full and return to globaltitles@ofcom.org.uk

Consultation title	Consultation: Global Titles and Mobile Network Security
Full name	██████████
Contact phone number	+██████████
Representing (delete as appropriate)	Organisation
Organisation name	Transatel
Email address	██████████

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? – No</p> <p>While Transatel fully supports initiatives to combat the misuse of Global Titles (GTs), we do not support banning the “leasing” of GTs by Mobile Network Operators (MNOs) in the United Kingdom to Mobile Virtual Network Operators (MVNOs), Mobile Virtual Network Enablers (MVNEs) and Mobile Virtual Network Aggregators (MVNAs), hereinafter collectively referred to as MVNXs. MVNXs rely on the GTs of their host MNOs to offer not only traditional services such as voice, data and SMS to consumers and business, as well as to support a growing range of machine-to-machine (M2M) and internet of thing (IoT) services.</p> <p>Transatel believes that the provision of GTs by MNOs to MVNXs does not constitute a lease of GTs. Instead, it forms part of an integrated service offering of an MNO to an MVNX that leverages the technical architecture of their respective networks, rather than the mere leasing of GTs.</p> <p>Should Ofcom disagree with Transatel’s perspective that the provision of GTs by MNOs to MVNXs does not constitute a lease, we believe that malicious signalling can be mitigated through less severe measures than an outright ban, such as the measures identified in the GSMA Code of Conduct and summarized by Ofcom in section 2.25 of the consultation document.</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? – No</p> <p>Please see our response to Question 1 and 8.</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? – No</p> <p>Transatel agrees with Ofcom’s proposal to ban the creation of GTs by third parties from sub-allocated numbers.</p>

Question	Your response
<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? – No</p> <p>Please see our response to Question 1.</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? – No</p> <p>Transatel supports Ofcom’s proposal to prohibit the creation of GTs from number ranges that have not been allocated for use.</p>
<p>Question 6: Do you agree with the proposed implementation period?</p>	<p>Confidential? – No</p> <p>Please see our response to Question 1.</p>
<p>Question 7: Do you agree with our provisional impact assessment?</p>	<p>Confidential? – No</p> <p>The ban of the provision of GTs to MVNXs by MNOs, will impact MVNXs and their customers and require additional assessment. Customers of MVNXs, for example, will need to find alternative service providers as many MNVXs will be forced to exit the market. In addition, finding alternative suppliers may prove complex for IoT and M2M devices that do not support over the air provisioning.</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? – No</p> <p>Transatel respectfully propose that a third exception be added to B3.8.2 of the National Telephone Numbering Plan being proposed by Ofcom in the consultation. The exception would read as follows:</p> <ul style="list-style-type: none"> c) a mobile virtual network operator, mobile virtual network aggregators or mobile virtual network enabler, provided that the Telephone Number used as a Global Title is not used for any other purpose.

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