



Global Titles and Mobile Network Security

Proposals to address misuse of Global Titles

Virgin Media O2 response

15th October 2024

Non-Confidential

Executive Summary

Virgin Media O2 (VMO2) welcomes the opportunity to contribute to Ofcom's Consultation (the 'consultation') looking at proposals to address potential misuse of Global Titles.

As a communications provider, VMO2 places great significance on protecting our customers from harm as much as possible. Whether via increased attempts to consistently educate our customers to potential scams they may be victim to and ways in which they can protect themselves, or via the introduction of processes and technology, we are constantly attempting to support our customers in the fight against scammers. We appreciate the recent steps Ofcom has taken, via consultations and CFIs, looking to address consumer harm in this space and this extends to this latest consultation. We welcome Ofcom expanding its gaze to other areas of potential harms and the potential misuse of Global Titles, and it is right that industry should look to improve processes where harms may arise.

Within the consultation, Ofcom clearly highlights the harms it feels the misuse of Global Titles can lead to, alongside a number of pieces of evidence demonstrating such harm. We appreciate the information provided and understand this is something that can lead to harm and therefore steps should be taken to close any "loopholes" where possible. The evidence presented ranges from commissioned reports and feedback from the National Cyber Security Centre to media reports. Clearly, as the regulator, Ofcom must take such reports seriously and act upon them, but the high-level principle must always be that any steps taken are both proportionate and reasonable.

As Ofcom highlights, there are already a number of measures currently in place that look to address potential harms in this specific space. On review, whilst understanding the view that individually current measures may not comprehensively address any issues, collectively these measures would appear to be substantial and cover much of what would be needed to reduce harm in the world of Global Titles. New regulatory interventions can be both necessary and unavoidable but VMO2 would always recommend looking towards existing rules and codes and how they can be better implemented before implementing further regulatory rules.

Although Ofcom has addressed the types of harm that can result from the misuse of Global Titles, the consultation does not consider 'Spoofing of GTs' which can be initiated from any location around the world and could allow attacks like interception and SMS interception to continue. We believe this is something that could be the cause of harms mentioned and therefore warrants further analysis.

Below, we have provided responses to the questions posed in the consultation.

Consultation Question Responses

Please see below for our response to the specific questions in the 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.

Overall, VMO2 does not oppose the proposed ban on the leasing of GT's to third parties. However, this position is dependent upon Ofcom allowing relevant exemptions to this process which we believe would be able to continue without posing harm to consumers.

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.

VMO2 agrees with the proposals to include exemptions to the ban relating to intra-group and suppliers. We believe ensuring these exemptions are in place is the correct approach and should allow providers to continue much of their existing processes. However, we also believe that a further exemption should be included, allowing one level of leasing to be permitted (no sub-leasing). To increase the security of such measures, and ensure full transparency, it should be made clear who GT's are leased to ahead of time.

Question 3

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

VMO2 does not currently have any thoughts on this question at this particular time.

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?

VMO2 agree with these proposals.

Question 5

Do you agree with our proposal to strengthen our rules to prohibit the creation of GTs from numbers not allocated for use?

As this is already restricted under the current General Conditions, VMO2 has no further comment.

Question 6

Do you agree with the proposed implementation period?

VMO2 appreciate Ofcom setting a timeframe of around 9 months for the implementation period. However, we note this is dependent upon any statement being published in line with the timings set out in the consultation. Therefore, we would expect any planned implementation date to be moved out if there were to be any delays in publication of the statement.

Regarding the implementation of supplementary guidance coming into effect immediately following the publication of Ofcom's final statement, under normal circumstances, we would oppose such a timeframe as it does not allow providers the requisite time to assess what is needed. However, as this is supplementary guidance purely to support interpretation of existing rules, we feel this may not be inappropriate.

Question 7

Do you agree with our provisional impact assessment?

Virgin Media O2 appreciates Ofcom's provisional impact assessment and has no further comments at this time.