



Vodafone Response to Ofcom Consultation: Global Titles and Mobile Network Security

Proposals to address misuse of Global Titles



1. Introduction

Vodafone welcomes the opportunity to comment on Ofcom's proposals for addressing the misuse of Global Titles. The current situation is bringing the UK industry into disrepute, and also has the potential to damage both UK networks and consumers. We have observed malicious signalling seeking to cause harm to our network, which appears to be based on leased Global Titles (GTs). We are therefore supportive of the aims of Ofcom's proposals.

2. Answers to Questions

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.

We support the motivation behind the proposals. Vodafone does not lease UK GTs to third parties outside the Vodafone Group. We have experienced malicious signalling using GTs leased by parties assigned number ranges by Ofcom, often involving chains of multiple sub-leases.

Whilst a ban on leasing GTs would not in and of itself prevent such bad actors from generating malicious signalling – an obvious perpetrator side-step is to spoof a GT from either an assigned or spare number range – it will make it much easier to determine if GTs are likely to be valid. In any case, an argument of “*but bad actors will only circumvent the regulation*” is not a reason to avoid regulation in the first place.

We do, however, acknowledge that there are use cases which are legitimate and could be adversely impacted by the proposals – notably host mobile networks sub-letting GTs to thick MVNOs, and divestment of business operations where it is impracticable to re-number without significant adverse customer impact. Whilst empathising, we disagree with a view that this is a reason to avoid **any** change and believe that Ofcom's proposals to ban leasing are justified so long as accommodations can be made for exceptional valid cases. We therefore would suggest that:

- Only one level of leasing should be permitted (i.e. no sub-letting of leased GTs), and that this should be with Ofcom consent, with a justification of why it is impracticable for the lessee to adopt their own GT (for example considerations of customer impact), and
- Ofcom should maintain a register of leases, to be available for inspection to communications providers with a valid need to see these.



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

We welcome Ofcom's acknowledgement of group structures; for example certain functions are centralised and/or virtualised across Vodafone Group rather than operated by Vodafone UK (we further note that it is valid for functions serving UK customers to be located outside the UK, subject to compliance with information privacy and telecoms security legislation).

We believe that consideration needs to be given to the impact of Merger & Acquisition (M&A) activity, and in particular the scenario of group companies being divested. Whilst the ideal outcome of a divestment should be that the company concerned should utilise their own GT, at the least there will need to be a transition period whilst this is organised, and practicably it must be acknowledged that this may not be feasible (for example if it resulted in having to issue new IMSIs to devices where these aren't easily updated, such as IoT devices). Where renumbering is feasible, rather than being prescriptive, we think that it is best that Ofcom allows a grace period on a case-by-case basis according to the specifics of the situation. We note that in this situation, the signalling relationships are likely to be long-standing, so third-party networks interacting with the GT concerned should be aware that the company operating the GT is being divested/changing ownership. As set out in our response to Question 1, where it is not practicable to re-number and the M&A results in an ongoing lease of a GT, we believe that Ofcom should host information on the specifics, in order that other communication providers are aware.

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

We agree with the proposals. Whilst we set out scenarios in response to Question 1 of why existing GT arrangements may need to continue, we do not see a case for new GTs to be created in this way.

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?

Subject to incorporating in the proposal in our response to Question 1, we agree with the 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?

Whilst supporting the strengthening of the rules, we think of greater importance is enforcement of them. Ofcom should consider whether it is appropriate to establish a mechanism for sharing intelligence on mis-use of GTs created from non-allocated number ranges.

Question 6: Do you agree with the proposed implementation period?

For leasing arrangements, the proposals amount to an implementation period of approximately nine months from statement to the revised regulations coming into force. Whilst we don't believe that Vodafone needs to make any changes itself, we believe that Ofcom has set a reasonable implementation period.

We note that the requirement on rangeholder due diligence would have immediate effect.

Question 7: Do you agree with our provisional impact assessment?

We believe the impact assessment adequately addresses the costs and benefits of the proposed changes.



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?

We agree that the proposed changes have the effect anticipated by Ofcom. However, we believe that the proposals in Schedule 1 need updating in light of the proposal that we set out in response to Question 1. We would be happy to work with Ofcom to agree a suitable form of words. For example the text could be modified as follows:

B3.8.1 : Other than with specific Ofcom consent, ~~Only~~ those persons to whom Ofcom has Allocated a Telephone Number shall create a Global Title from such a Telephone Number

B3.8.2: Any person Allocated a Telephone Number shall not authorise the use of that Telephone Number by others for use as a Global Title without Ofcom consent, except if the person being authorised is:

- a) a person in the same group, as defined in section 1261(1) of the Companies Act 2006, or
- b) a person supplying services to the person authorising the use, provided that the Telephone Number used as a Global Title is used exclusively to provide that service and for no other purpose.

Vodafone UK
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