

Networks and Communications Group (Global Titles Team)  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

Dear Sir or Madam,

**Re: Global Titles and Mobile Network Security**

Thank you for your 22 July 2024 consultation on Global Titles and mobile network security.

The Mobile Ecosystem Forum (MEF) is a global trade association headquartered in London with members in 45 countries. We seek to provide an international perspective on matters that impact our members and the communications ecosystem as a whole. MEF members collaborate to develop and support best practices, codes of conduct, and anti-fraud schemes that benefit consumers, mobile network operators, and organisations that engage with the public through their phones.

Our comments to the consultation are given in the following pages, using the format of your standard response form. The key observations are:

- The abuse of Global Titles (GTs) represents a genuine and ongoing threat to both the public and to business
- The GSMA has issued high-quality guidance on how to curb the abuse of Global Titles but the rate of voluntary adoption has been slow
- The extreme severity of the harm that can be done to individuals through the abuse of GTs should be weighed against the relatively small proportion of communications providers that admit to leasing GTs and the limited voluntary compliance with the GSMA's GT Leasing Code of Conduct
- Inadequate due diligence on lessees of Global Title is representative of wider industry problems with inadequate know-your-customer (KYC) controls effected by some communications providers before they choose to transact with another business
- The anecdotal report of communications providers is that the reputation of the UK is being harmed by the misuse of UK mobile numbers as enabled by the leasing of GTs
- Ofcom's proposals are broadly consistent with the best industry guidance

Yours sincerely,



# 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>	██████████
<b>Contact phone number</b>	██████████
<b>Representing (delete as appropriate)</b>	Self / Organisation
<b>Organisation name</b>	Mobile Ecosystem Forum
<b>Email address</b>	██

## 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>	Nothing / <del>Your name / Organisation name / Whole response / Part of the response (you will need to indicate which question responses are confidential)</del>
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None / <del>Whole response / Part of the response (you will need to indicate below which question responses are confidential)</del>
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes / No

## 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 your proposal.</p> <p>In particular, the extreme harm that an individual may suffer as a result of the abuse of GT should weigh heavily in favour of banning GT leasing. This stands against the observation that only a minority of communications providers admit to leasing GTs, whilst voluntary compliance with the GSMA GT Leasing Code of Conduct has been lacklustre. The research conducted by Enea is compelling; it identifies a fundamental problem where GT leasing of UK numbers occurs more often than is reported, and hence is subject to fewer controls than is admitted.</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>We agree with your proposal.</p> <p>Genuine arguments for other exemptions must be balanced against the fact that such exemptions will almost certainly become the focus of abuse by bad actors. Policing exemptions is problematic. The simpler the rules, with fewer exemptions, the better the prospects of reducing the abuse of GTs.</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 agree with your proposal.</p> <p>If a party has a genuine need to create GTs then nothing stops them applying directly to Ofcom for a number range. Ofcom is likely to be more stringent in the application of due diligence over such applications than some businesses have been in practice.</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</p>	<p>Confidential? – N</p> <p>We agree with your proposal.</p>

Question	Your response
<p>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><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 your proposal.</p> <p>There is no legitimate reason to create GTs from unallocated numbers.</p>
<p><b>Question 6:</b> Do you agree with the proposed implementation period?</p>	<p>Confidential? – N</p> <p>We agree with your proposed implementation period.</p> <p>The severe risk to individuals posed by the ongoing abuse of GTs justifies urgency when implementing remedies.</p>
<p><b>Question 7:</b> Do you agree with our provisional impact assessment?</p>	<p>Confidential? – N</p> <p>We agree with your provisional impact assessment.</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>We agree with all of these proposals.</p>

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