Telecommunications (Jersey) Law 2002

Interim guidance in relation to Global Titles

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Purpose of this interim guidance

The Jersey Competition Regulatory Authority (the ***JCRA***) was established by the Competition Regulatory Authority (Jersey) Law 2001[1]. The JCRA has responsibility for the administration and enforcement of the Telecommunications (Jersey) Law 2002 (the ***Telecoms Law***)[2]

The JCRA licenses the running of part or all of a telecommunications system in Jersey. These licences consist of three types of personal licence – Class I, Class II and Class III licences – and a general class licence. This guidance relates to Class II and Class III licences, holders of which may be allocated +44 telephone numbers from the UK range.

Global Titles (***GT***s) are created from mobile numbers and are used by Mobile Network Operators (MNOs) as routing addresses for the exchange of SS7 signalling messages between 2G and 3G mobile networks and to support their provision of mobile services. Mobile numbers used as GTs are only used for that purpose and are not given to subscribers.

All telecoms licences contain conditions relating to the use of numbers to create GTs, which come into effect during 2026 and 2027. These conditions were introduced to prevent the misuse of GTs and followed similar action by Ofcom in relation to mobile numbers in the UK. Ofcom had evidence that some +44 GTs were a source of malicious signalling traffic affecting mobile networks and their subscribers. This raised issues of network security, privacy, reputation and fraud, which are as applicable to Jersey +44 mobile numbers as they are to the UK.

Malicious signalling can occur when MNOs use GTs created from numbers allocated to them by Ofcom as inputs to services they provide to their customers.

Under a proposed Memorandum of Understanding between the JCRA and Ofcom relating to numbering more generally, the JCRA will agree to seek to modify the licences further to incorporate the relevant provisions of Ofcom's General Conditions of Entitlement (***General Conditions***) relating to the use of numbers. If these modifications are made, Jersey MNOs will have a range of obligations in relation to the use of numbers allocated by Ofcom, which will include conditions which relate to GTs.

Pending any such modifications, the JCRA is publishing this Interim Guidance, which closely follows that published by Ofcom, for +44 number range holders on their responsibilities to prevent the misuse of their GTs. It sets out the steps the JCRA expects number range holders to take to prevent their GTs being misused. This will provide clarity on how the JCRA will expect

[1] Competition Regulatory Authority (Jersey) Law 2001 (jerseylaw.je)
[2] Telecommunications (Jersey) Law 2002 (jerseylaw.je)

number range holders to meet the obligations under modified licences. In the event that the modifications are made, the JCRA will update this document to final form.

Notes:

- This document is for guidance only. Any variation to the approach set out in this guidance will be explained.
- This guidance should not be relied on as a substitute for the Telecoms Law. If you have any doubts about your position under the Telecoms Law, you should seek legal advice.

1. Introduction

Ofcom's consultation and the JCRA's modification of licences

The JCRA wrote to each of the Island's three MNOs on 9 September 2024 in relation to the consultation then being undertaken by Ofcom in relation to a proposed prohibition on the leasing by UK MNOs of GTs created from numbers allocated to them. The JCRA indicated that, if on conclusion of the consultation, Ofcom proceeded to implement such a prohibition, the JCRA would be minded to impose an equivalent prohibition on Jersey's MNOs. Each of the Jersey MNOs made representations to Ofcom in relation to the consultation.

On 22 April 2025, Ofcom published a statement confirming that the further leasing of GTs would be banned with immediate effect and that existing arrangements would be banned from 22 April 2026.

Accordingly, the JCRA issued an Initial Notice of its intention to modify the existing licences to bring in an immediate ban on new leases of GTs and a total prohibition from 1 January 2027. After representations from MNOs, these dates have been moved back:

- the ban on new leases comes into effect on 1 March 2026; and
- the total prohibition comes into effect on 1 May 2027.

+44 Numbers in Jersey

Under Part 8A of the Telecoms Law, the JCRA and the UK telecoms regulator, Ofcom, are given functions in relation to +44 telephone numbers in Jersey, including mobile phone numbers issued to MNOs. Article 46B(1) of the Telecoms Law provides that Ofcom may allocate, manage and withdraw telephone numbers in Jersey. This will be in the context of the National Telephone Numbering Plan (***National Plan***). Article 46B(2) requires Ofcom and the JCRA to agree the relevant procedures for doing this, which procedures must be approved by the Minister.

Ofcom and the JCRA intend to enter into a Memorandum of Understanding (***MoU***, which will set out these procedures. The terms of the MoU will include an expectation that the JCRA will seek to modify the conditions of each licence to incorporate further obligations on licence holders in relation to telephone numbers (***Numbering Conditions***). These would be in line with the provisions of the General Conditions relating to the use of telephone numbers.

The JCRA therefore intends to consult with licensees in relation to the introduction of the Numbering Conditions and, depending on the outcome of the consultation, it would issue an appropriate initial notice under Article 11(1) of the Telecom Law. If no representations were received, it would proceed to implement the modifications under Article 18(1), by issuing a

final notice and modified licences. Should representations be received, the JCRA would consider them and determine what action to take, consistent with the provisions of the Telecoms Law.

The MoU will also set out a version of the National Plan as it applies to Jersey, the ***Jersey Numbering Scheme***. The existing licence conditions relating to numbering already contemplates the existence of a Jersey version of the Numbering Plan.

Enforcement of Numbering Conditions

If the licences are modified to include the Numbering Conditions, the JCRA would be responsible for enforcing their provisions. If a Numbering Condition were contravened, the JCRA could issue directions to the licensee or impose financial penalties, under Articles 19 and 19A respectively.

Ofcom has issued its Guidance for number range holders to prevent misuse of Global Titles (the ***Ofcom Guidance***). The Ofcom Guidance reflects the relevant General Conditions which in turn would be reflected in the Numbering Conditions, and the prohibitions relating to GTs mentioned above.

In the interests of transparency, and subject to the consultation referred to above, the JCRA has decided to issue this Interim Guidance, which closely follows the Ofcom Guidance. This is to ensure that licensees see the context in which compliance with the proposed Numbering Conditions would be addressed by the JCRA. If the Numbering Conditions are incorporated into the licences, the Authority will update this Interim Guidance, by reference to those conditions.

2. Guidance to prevent Global Title misuse

Where a number range holder is providing a service to a customer (using a GT as an input) that has the potential to generate malicious signalling, the range holder is expected to take appropriate steps to prevent the misuse.

The nature and extent of the steps range holders will be expected to take will depend on what is considered appropriate in the specific circumstances, taking into account:

- the nature of the service it is providing (and whether it should be considered higher risk);
- the risk of malicious signalling;[3]
- the customer the range holder is providing the service to;
- knowledge of any previous malicious signalling carried out by that customer; and
- that customer's intended use of the service.

Each range holders should therefore first assess whether a particular service it is providing to a customer (using a GT as an input) has the potential to generate malicious signalling.

Where a range holder identifies a service that has the potential to generate malicious signalling, it is expected to, at minimum, take reasonable steps to understand the customer that has requested the service, and the risk of misuse, before providing the service. This includes Know Your Customer (KYC) checks, checks on the intended use of the service and considering any indicators of a high-risk customer.

As part of this assessment, range holders are expected to check for any unusual activity involving the customer's services.

Range holders are expected to record the steps that have been taken and ensure they are signed off by an appropriate senior manager.

Depending on the circumstances and the nature of the risk involved, range holders may also be expected to:

- put processes in place to ensure continued compliance with relevant numbering rules and prevent illegitimate use. This includes:

[3] Range holders are expected to have regard to the use of abnormal signalling traffic types identified in the GSMA's FS.11 publication - SS7 Interconnect Security Monitoring and Firewall Guidelines.

- putting appropriate contractual controls in place in relation to the use of the relevant service and to ensure customers are required to comply with relevant numbering rules;
- keeping risk assessments under review and updating them in response to significant changes to the commercial relationship between the range holder and the customer; and
- routinely testing and/or monitoring specific risks associated with a particular customer

- put processes in place to appropriately respond to any incident where a customer is using a service (which uses the range holder's GT as an input) for an illegitimate purpose. This includes:
  - developing and maintaining a process for capturing and handling complaints and maintaining a record of any investigations, outcomes and action taken;
  - taking appropriate action to investigate and resolve incidents of potential illegitimate use in a timely manner; and
  - as far as reasonably possible, preventing any further potential illegitimate use once they have been informed of, or have identified, a potential concern. This may include requiring urgent action from the customer in response to a complaint, applying temporary blocks to services, or using contractual controls to withdraw services.

Services that are at a higher risk of generating malicious signalling

When assessing what steps are appropriate for a particular service, range holders should have regard to, among other things, the types of malicious signalling that may occur and the level of risk of that malicious signalling occurring.

Where a service with a higher risk of malicious signalling is provided, it is likely to be appropriate to include the additional bulleted steps described above, in addition to those in the earlier paragraphs of this Guidance.

Set out below are examples of two types of service with a higher risk of malicious signalling and examples of measures that are likely to be appropriate to address the specific risks associated with those services.

Example 1: GT modification services

GT modification is an established alternative arrangement to GT leasing (e.g. it is associated with outbound roaming services). It might be considered for other services as a result of the ban on GT leasing.

GT modification services allow a customer to use a range holder's GT indirectly to exchange SS7 signalling messages with other mobile networks. While GT modification can reduce the risk of harm relative to GT leasing and enhance the transparency and accountability of the operators using GTs, there is still a significant risk of malicious signalling where services are provided using GT modification because the customer has the capability to send signalling messages. Range holders and other operators are therefore encouraged to consider if there are alternative, lower risk methods available to facilitate the provision of mobile services.

If range holders consider it necessary to provide GT modification services, then it is expected to implement further measures that are appropriate for these higher risk services, which is likely to include those additional bulleted steps set out above.

Taking into account those further measures examples of more specific controls that it is likely to be appropriate for a range holder offering GT modification services to put in place include:

- performing routine due diligence checks on customers to ensure GT modification is only facilitating legitimate services;
- implementing contractual measures that limit the customer's signalling to the specified service; and
- carrying out routine monitoring and inspection of the customer's traffic via the range holder's firewall.

Example 2: Home location register (HLR) lookup services

A range of services are referred to as HLR lookup, including authentication services, least cost routing and number authentication services.

HLR lookup services are an example of a higher risk service because they facilitate access to operational data held by mobile networks, some of which may be personal data and/or location data which is subject to legal requirements under relevant data protection legislation.

Range holders providing, or indirectly facilitating provision of, HLR lookup services are expected to be alert to the risk that such services may be facilitating access to operational data held by mobile networks which may be contrary to relevant data protection legislation.

Range holders directly providing or indirectly facilitating their customer's provision of an HLR lookup service are therefore expected to implement further measures that are appropriate for these higher risk services, which is likely to include additional bulleted steps set out above.

Taking into account those further measures, examples of more specific measures that it is likely to be appropriate for a range holder to put in place include carrying out due diligence checks to:

- determine whether data gathered by its customer is subject to data protection legislation, including the Data Protection (Jersey) Law 2018 and any subordinate or other Jersey legislation relating to data privacy; and
- where applicable, ensure its customer is taking appropriate steps to comply with relevant data protection legislation, including but not limited to carrying out due diligence on customers to ensure that they:
    - have a legitimate basis for processing data; and
    - are complying with any applicable requirements relating to the processing of location data.