Sure response to GCRA's Global Title Leasing – proposed Decision (non-confidential)

4 September 2026

1 Summary

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2 We welcome the opportunity to respond to the Authority's proposed Decision on Global Title leasing. The Authority will be aware that this is an issue of significant commercial and operational interest for us. Our focus has remained throughout these policy discussions to ensure that any malicious use of Global Titles is minimised while enabling any legitimate use of signalling services to continue as efficiently as possible.

3 For the avoidance of doubt, Sure strongly supports measures that prevent misuse of Global Titles and which can lead to malicious signalling traffic.

4 In our response to your consultation of 30 January 2025, we set out what we considered to be an approach that would remove the necessity for an outright prohibition of GT Leasing. That involved the adoption of a control framework with the associated use of the GSMA FS.52 Leasing Code of Conduct. We also stated that there should be a period of 18 months from the point of any Decision to allow for a period of orderly implementation of any alternative replacement – including GT Modification. This remains broadly our view.

5 However, in terms of the proposed Decision to prohibit the leasing of Global Titles, we recognise that there have been material regulatory and policy developments since the January 2025 consultation. The Authority has set these out in this proposed Decision and it is clear that there is a policy intent to prohibit the leasing of Global Titles that use +44 numbers. This is in line with the equivalent Decisions by Ofcom and States of Jersey and the recent stated preference of the States of Guernsey as set out in its letter to the Authority on 14 July 2026.

6 If this is, indeed, the course of action that the Authority decides to take then it is incumbent on it to enable licensed operators and their existing customers to implement alternative arrangements in as orderly a fashion as possible.

7 In this response we set out what we believe should happen next to minimise the risk of commercial damage to Sure and its customers using GT Leasing for legitimate and legal purposes. This can be achieved but only if the prohibition of GT Leasing is undertaken within a reasonable timeframe. We are also seeking clarity from the Authority on specific proposals in its proposed Decision to ensure that we are compliant with the provisions set out by the Authority once the leasing prohibition comes into force.

8 Our representations on the proposed Decision relate to:

a. The timing of the new arrangements coming into force and the inadequate period of time the Authority is proposing to give for us to make alternative technical and commercial arrangements;

b. The use cases that we consider are sufficiently low risk for the Authority to include them in the "limited circumstances" where GT Leasing could be allowed; and

c. Areas where further consideration from the Authority is required ahead of any implementation of a Global Titles leasing ban.

2 Areas of continuing concern

2.1 May 2027 is too early for the GT Leasing prohibition to come into effect

9 The 14 July letter from the States of Guernsey sets out its expectation that the prohibition on GT Leasing should come into effect from 1 May 2027. While this creates a neat symmetry with the equivalent ban in Jersey, it does not serve the interests of legitimate commercial use of GT Leasing in Guernsey well.

10 As a starting point and as a matter of process, no Decision has been taken yet on whether to ban GT Leasing in Guernsey. That Decision can only be made once the Authority has considered views set out in response to this proposed Decision. It must reserve the discretion to change its mind on the basis of all representations it receives. The implementation date for any GT Leasing ban should, therefore, take as its starting point the date of the formal Decision.

11 Given the likely timeframe for completing the current process including due consideration by the Authority of any representations made by stakeholders, the Authority is expecting licensed operators to put in place alternative technical and commercial arrangements – notably the technically challenging GT Modifications – in six months or, potentially, less. The Authority may choose to point to the longer consultation process that has led to this point. However, our view is that:

a. It cannot expect us to make transformative changes to legitimate commercial and technical arrangements until there is certainty that they are necessary. We do not know this yet;

b. The proposed acceptance of GT Modifications is new, set out for the first time in the Authority's proposed Decision. Any move towards this as an alternative arrangement will require extensive technical testing. ✂; and

c. We will need to undertake ✂.

12 Taking all of the above into account, 1 May 2027 is an unreasonable date for Sure to be expected to put these alternative arrangements in place. In our January 2025 response to your previous consultation on GT Leasing, we gave the carefully considered view that 12-18 months *from the*

point of Decision represented the required timeframe to ensure an orderly transition to the new arrangements. This remains our view and suggests an implementation date no earlier than the end of 2027.

13 The Authority's adoption of effectively a less than six-month implementation timeframe contrasts sharply with approaches in other jurisdictions.

a. The JCRA, for example, introduced its measures to prevent GT Leasing in March 2026 but with an implementation deadline of May 2027 – or 14 months after its Decision; and

b. Ofcom announced its ban on Global Title leasing in April 2025 with an implementation period of April 2026 – a 12-month implementation period.

14 In the cases above, the 14 and 12-month implementation periods started at the point of the respective final Decisions. In the case of Guernsey, we have not yet reached that stage, yet we are *already* only seven months away from the Authority's proposed implementation date. This risks ✂.

15 As a result of the above the Authority should amend the timeframe for GT Leasing prohibition to be no later than the end of 2027 and, preferably, at a later deadline in summer 2028.

2.2 There are legitimate use cases which should be included in the definition of "limited circumstances"

16 The Authority is proposing to allow GT Leasing in what it describes as "limited circumstances" and this provision will be reflected in operator's new licence conditions. It is unclear what these "limited circumstances" are based on the proposed Decision. However, we consider that there are very specific use cases where GT Leasing would represent such a low risk of SS7 signalling misuse, that they should be included in this definition and allowed to continue.

17 We set these out below.

2.2.1 IMSI Leasing for MVNO's

18 ✂ our MVNO(s) would need to know the mapped Global Title to enable charging when CAMEL roaming (Customised Applications for Mobile Networks Enhanced Logic) ✂

19 ✂.

20 ✂.

21 ✂.

2.2.2 Network extensions for MVNOs

22 ✂. However an MVNO will still need to know the actual Global Title on their IR.21/C11[1] document for their inbound roaming traffic ✂.

23 ✂.

2.2.3 Penetration testing

24 As set out above, we will need to undertake intensive testing ahead of moving from GT Leasing to GT Modifications. To ensure that this testing provides the most meaningful results, there will be occasions where we would ideally continue to test Global Titles beyond the date where they have been prohibited – and potentially for categories 1, 2 and 3 access as defined by the GSMA.

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26 ✂.

2.3 There are other areas in the proposed Decision which require further consideration

27 We set out below two areas where we would believe the Authority needs to give further thought. The first of which relates to where we believe it is being overly prescriptive. The second is where it is being too vague.

2.3.1 It is unclear to us why licence conditions are required for our due diligence requirements

28 The Authority states in paragraph 7.1 that "Having considered the matters set out in sections 4 to 6, the GCRA considers that new licence conditions are required to address the risks associated with GT leasing in the Bailiwick". We recognise that the decision to prohibit GT Leasing (and, by extension, their use by sub-allocated numbers) *may* be most effectively achieved by a new licence condition. However, the Authority then proceeds to add more licence conditions relating to how operators should carry out their obligations. There is no explanation why the Authority considers this level of micro-management to be necessary.

29 We are particularly concerned by the proposals set out in paragraphs 7.40.1-7.40.6 which seek to implement licence conditions on how due diligence on preventing malicious signalling should be undertaken. The Authority does not explain why it has diverged from the approach taken by Ofcom and JCRA, who have both issued detailed - but non-prescriptive - guidance but not

[1] GSMA document format used by mobile network operators to exchange roaming, routing, and technical network information

amended either licences or the General Conditions. The proposed Decision, in paragraph 7.43, points to the harmful risks of signalling misuse but does not set out why those risks are greater or more impactful in the Bailiwick of Guernsey than elsewhere. – necessitating this proposed more prescriptive approach,

30 Any future breach of a prohibition on GT Leasing would inevitably carry serious penalties for the responsible operator, especially if this were to lead to harmful outcomes. There is a very strong incentive for all operators to comply with the Decision of the Authority without being prescribed how it should do so.

31 Our view is that the Authority should not become involved in detailed instructions to industry as to how it should comply with well-understood regulatory obligations. It risks regulatory failure as operators are forced to focus on contractual "box-ticking" compliance exercises with customers as opposed to taking the correct action in the prevailing circumstances to ensure the right outcomes. This is, in our view, bad regulatory practice and contrasts with the more outcomes-based approach taken by Ofcom and the JCRA who have given latitude to licensed operators as to how they comply with the equivalent regulation.

32 For the avoidance of doubt, as a responsible operator, Sure ensures that the correct commercial arrangements are in place and that robust checks are made on our trading partners to ensure responsible practices on our networks. We will continue to do so and, where necessary, adapt to our evolving regulatory obligations.

2.3.2 The Authority needs to be clearer on operator's misuse reporting obligations

33 In paragraph 7.44 to 7.47 the Authority sets out how it expects operators to report any evidence of misuse on its network. It states that operators should notify the Authority "promptly" and that the assessment of what constitutes "prompt" should be risk-based depending on whether the misuse is "significant" or "likely to cause significant harm".

34 These terms are too vague and could create a real risk that a licence breach may unwittingly occur, even after the best efforts of an operator to do what it believes to be the right thing. In practice, this approach will likely lead to premature over-reporting as there will inevitably be no clear view on whether Sure's view of "prompt" and "significant" is the same as that of the Authority. To avoid a licence breach, we will be under pressure to notify as soon as possible and before we have the full facts to hand.

35 ✂.

36 There are risks inherent with incentivising premature notifications such as these. Apart from those of the facts not yet being established, there is the resourcing implications of diverting subject matter experts away from investigating the suspected network misuse at an early stage to engaging with the Authority before the facts are known.

37 In contrast to the proposed approach, our view is that the Authority needs to give clearer guidance on its expectations as to when it expects suspected or actual misuse activity to be notified. This includes what it believes to constitute "significant" and "significant harm".

38 We also urge a broad approach from the Authority towards a light touch approach to network misuse update requests. ✂. While we understand the appetite for information on ongoing issues, this should not be at the expense of allowing operators to focus on addressing issues and/or establishing full background facts.