GLOBAL TITLE LEASING

T1655G

FINAL DECISION

Date: 06/11/2026

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1. SUMMARY

1.1 Global Titles ("GTs") are telephone numbers used within mobile telecommunications networks as addressing identifiers for the exchange of signalling messages. They play an important role in the provision of mobile telecommunications services and support a range of legitimate network functions, including roaming, subscriber authentication, SMS delivery, interconnection and call management.

1.2 GT leasing occurs where a telecommunications operator permits a third party to use GTs associated with the operator's numbering resources. GT leasing has historically been used to support a range of legitimate commercial services and may provide operational and commercial benefits to both the lessor and the lessee.

1.3 However, GT leasing also enables third parties to obtain access to signalling capabilities associated with trusted telecommunications operators. In the GCRA's view, this can reduce transparency and accountability within signalling networks and create opportunities for malicious signalling activity.

1.4 The GCRA has become increasingly concerned about the risks associated with GT leasing. The evidence considered by the GCRA demonstrates that these risks are not merely theoretical. Evidence of GT misuse has been identified internationally and has also been associated with telecommunications resources allocated for use within Guernsey and the wider Channel Islands. The GCRA is particularly concerned that continued misuse, or the perception of misuse, may harm consumers, undermine trust between telecommunications operators, damage the reputation of the Bailiwick and adversely affect its wider economic interests.

1.5 In January 2025, the GCRA consulted on whether regulatory intervention was required. Following consideration of the responses received, additional evidence gathered by the GCRA, regulatory developments in the United Kingdom and Jersey, and the policy position communicated by the States of Guernsey that GT leasing should cease from 1 May 2027, the GCRA published a Proposed Decision in July 2026.

1.6 Having carefully considered the consultation responses received, the wider evidence available to it, and its statutory duties, the GCRA has concluded that GT leasing gives rise to significant risks which are not adequately addressed through existing controls. The GCRA has therefore decided to:

- Prohibit GT leasing by Licensed Operators to third parties from **1 May 2027**;
- Prohibit the creation and use of GTs from sub-allocated number ranges from **1 May 2027**;
- Introduce additional licence conditions requiring Licensees providing services capable of generating malicious signalling to implement appropriate risk-based controls;
- Introduce notification obligations where Licensees become aware of malicious signalling activity; and
- Permit the existing arrangement between Sure and Coop Mobile to continue on a transitional basis until **1 December 2027**, after which it must cease.

1.7 The GCRA considers that these measures represent the most effective, appropriate and proportionate means of addressing the risks associated with GT leasing. In reaching this view, the GCRA has balanced the identified risks to consumers, telecommunications networks and the reputation of the Bailiwick against the implementation impacts on Licensed Operators and their customers.

1.8 Following publication of this Final Decision, the GCRA will proceed with implementation of the licence modifications set out in Annex A. The licence modifications contained in Annex A shall be added to licences by 30 November 2026. The prohibition on GT leasing and the associated licence modifications shall take effect on 1 May 2027, subject to the specific transitional arrangements described in this Decision.

1.9 The GCRA expects affected Licensees to take appropriate steps to ensure compliance with the new requirements by the applicable implementation dates.

2. STRUCTURE OF THIS DOCUMENT

2.1 This document is structured as follows:

Section 3	Sets out the legal framework for the licence modifications.
Section 4	Explains GTs, GT leasing, legitimate uses, and the risks associated with SS7 signalling.
Section 5	Summarises evidence of international and Guernsey-specific examples of misuse.
Section 6	Summarises the States of Guernsey's policy position regarding GT leasing.
Section 7	Sets out the GCRA's proposal to prohibit GT leasing, responses received to the Proposed Decision, and the GCRA's conclusions.
Section 8	Sets out the modification decision.
Annex A	Outlines the modifications to telecommunications licences in the Bailiwick of Guernsey.

3. LEGAL FRAMEWORK

3.1 Section 8(1) of the Telecommunications (Bailiwick of Guernsey) Law, 2001 ("**Telecommunications Law**") provides as follows:

"*Having regard to the objectives set out in section 2 of the Regulation Law, and subject to the provisions of any States' Directions and the following provisions of this section, the [Authority] may modify a licence by amending or revoking any condition included in it or by adding any condition to it (including, subject to the provisions of section 9, any condition as to the application in relation to the licensee of the code).*"[1]

3.2 Before making any modifications to a licence, the GCRA must follow the procedure set out in section 8(2) of the Telecoms Law, which provides as follows:

"Before making modifications under this section to a licence, the [Authority] shall publish, and (in the case of an individual licence) give to the holder of the licence, notice –

(a) stating the modifications that [it] proposes to make,
(b) stating the reasons why [it] proposes to make those modifications, and
(c) specifying the time (not being less than 7 days from the date of publication of the notice) within which written representations or objections in respect of the proposed modifications may be made by interested parties."[2]

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3.3 Having followed the above procedure, the GCRA must make its decision and publish notice of that decision[3].

3.4 Section 2 of the Regulation of Utilities (Bailiwick of Guernsey) Law, 2001 ("**Regulation Law**") states that the GCRA has a duty to promote certain objectives when exercising its functions and powers:

"*In exercising their respective functions and powers [under this Law and any Sector Law], the States and [the Guernsey Competition and Regulatory Authority ("the Authority")] shall each have a duty to promote (and, where they conflict, to balance) the following objectives –*

(a) to protect the interests of consumers and other users in the Bailiwick in respect of the prices charged for, and the quality, service levels, permanence and variety of, utility services,

(b) to secure, so far as practicable, the provision of utility services that satisfy all reasonable demands for such services within the Bailiwick, whether those services are supplied from, within or to the Bailiwick,

(c) to ensure that utility activities are carried out in such a way as best to serve and contribute to the economic and social development and well-being of the Bailiwick

(d) to introduce, maintain and promote effective and sustainable competition in the provision of utility services in the Bailiwick, subject to any special or exclusive rights awarded to a licensee by [the Authority] pursuant to States' Directions

[1] Telecommunications Law, s.8(1)
[2] Telecommunications Law, s.8(2)
[3] Telecommunications Law, s.5(3)(b)

(e) to improve the quality and coverage of utility services and to facilitate the availability of new utility services within the Bailiwick, and

(f) to lessen, where practicable, any adverse impact of utility activities on the environment,

and, in performing the duty imposed by this section, the States and [the Authority] shall have equal regard to the interests of the residents of all islands of the Bailiwick[4]*.*

[4] Regulation Law, s.2

4. BACKGROUND

4.1. This section sets out the technical and regulatory background to GT leasing. It explains the role of GTs in mobile telecommunications networks and provides the context necessary to understand the risks, harms and security concerns considered by the Authority in this Decision.

4.2. It also describes the steps taken by the GCRA and other regulators to investigate and address the risks associated with GT leasing, including the regulatory and policy developments which have informed the Authority's assessment.

Global Titles

4.3. GTs are mobile telephone numbers which are adopted by mobile network operators and used as network node addresses. They are used to facilitate the exchange of control information between mobile telecommunications networks and network nodes and are not assigned to end-users.

4.4. GTs are used within the Signalling System No. 7 protocol ("**SS7**"), the signalling system used by 2G and 3G mobile networks to exchange the messages needed to provide mobile services. Within SS7, GTs are used as addresses within the Signalling Connection Control Part ("**SCCP**"), which enables signalling messages to be routed between network nodes using addresses other than direct point codes.

4.5. In simple terms, a GT allows a signalling message to be addressed using an E.164 mobile number format, and the network then uses a process known as Global Title Translation to translate that GT into the routing information needed to deliver the message to the relevant network node, including the destination point code and subsystem number. A GT performs a similar addressing function to a house address in the postal system or an IP address on the internet: it helps direct signalling messages to the correct destination within the network.

4.6. GTs are therefore essential to the exchange of SS7 signalling messages in 2G and 3G mobile networks, and consequently to the provision of 2G and 3G mobile services to end-users. They support a range of core mobile services and network functions, including international roaming, interconnection, subscriber authentication, SMS delivery, and the set-up and management of calls and other mobile services.

4.7. These functions are legitimate, necessary and beneficial for end-users. However, access to GTs also provides the ability to generate signalling traffic which may be relied upon by other telecommunications networks. Appropriate controls over the allocation and use of GTs are therefore important to maintaining the security and integrity of signalling networks.

4.8. SS7 is a legacy signalling system developed in the 1970s and standardised during the 1980s. It was designed for a telecommunications environment in which signalling networks were operated by a relatively small number of known and trusted network operators. As a result, SS7 does not incorporate many of the authentication and verification mechanisms that would be expected in a modern communications system.

4.9. Whilst SS7 continues to support important telecommunications services around the world, its reliance on trusted participants means that inappropriate access to signalling capabilities can create security risks. It is these risks, and the potential for misuse where GTs are provided beyond the entities responsible for operating telecommunications networks, which have led regulators and industry participants to examine the practice of GT leasing.

Global Title Leasing

4.10. GT leasing occurs when a holder of GTs, or mobile numbers that can be used as GTs, allows another party to use them for its own operational or commercial purposes. The party making the GTs available is commonly referred to as the "lessor" and the party using the GTs is commonly referred to as the "lessee".

4.11. In practical terms, GT leasing allows a lessee to assign GTs to its own network nodes or platforms. This enables the lessee's nodes, equipment and services to exchange signalling messages with other mobile networks, and to support services such as roaming, voice and SMS without owning its own GT range in each relevant jurisdiction.

4.12. GT leasing may take different forms. In some cases, a Licensed Operator may directly lease GTs to a third party. In other cases, the arrangements may involve onward leasing (also known as sub-leasing) or the use of sub-allocated numbers by a third party as GTs. The common feature is that a party other than the original range holder is able to generate or receive signalling traffic using GTs associated with that range holder's numbering resources.

4.13. GT leasing is therefore not only a commercial arrangement. It is also a technical arrangement which can affect how signalling traffic is presented to, and trusted by, other mobile network operators.

4.14. The GCRA recognises that GT leasing has been, and continues to be, used for legitimate purposes. These may include application-to-person ("A2P") messaging, international roaming support, network extension services, IoT connectivity, fraud prevention services, security testing, penetration testing, and other services which rely on access to mobile signalling.

4.15. GT leasing will have delivered commercial and operational benefits to both lessors and lessees. For lessors, GT leasing can generate revenue from numbering resources and network capabilities. For lessees, it can provide a route to offer mobile-related services without becoming a licensed mobile network operator in each relevant jurisdiction.

4.16. Customers of GT lessees may also benefit from services which rely on leased GTs. For example, business customers may use A2P messaging services to send one-time passcodes, service notifications or customer communications.

4.17. However, there are also significant risks associated with the leasing of GTs to third parties. GT leasing enables third parties to obtain access to global mobile signalling networks using GTs associated with a trusted network operator. Whilst many lessees may have legitimate purposes, GT leasing can reduce transparency regarding the origin and purpose of signalling traffic and may create opportunities for misuse where signalling capabilities are provided beyond the entities responsible for operating and controlling mobile telecommunications networks.

4.18. The corollary is that GT leasing creates a risk that bad actors may seek to obtain access to mobile signalling networks through leased GTs. That access could be exploited or misused to undertake malicious activities, such as:

- Tracking the location of mobile users on other mobile networks;

- Intercepting or diverting SMS messages and/or calls;
- Obtaining subscriber information held by a host mobile network;
- Facilitating fraud, such as account takeover; or
- Disrupting network services.

4.19. These harms are significant and may affect individual users, businesses, mobile network operators and public authorities.

4.20. GT leasing can also reduce transparency and trust between mobile network operators, which can have operational consequences for mobile networks and end-users.

4.21. In a trust-based system like SS7, receiving networks may assume that signalling traffic has originated from the lessor, which is typically an established and trusted mobile network operator, rather than from the lessee. GT leasing can therefore mask the true source and purpose of signalling traffic. It may also allow a lessee, including a bad actor, to benefit from the reputation and trusted status of the lessor. This may make it more likely that malicious traffic bypasses controls and enables the lessee to undertake activities such as those listed above.

4.22. This risk is increased where lessors do not maintain clear and complete records of who they have leased GTs to, what those GTs are being used for, and whether the lessee has onward leased or otherwise made the GTs available to another party. In those circumstances, it may be more difficult for mobile network operators, regulators and other relevant authorities to identify the true source of suspicious signalling traffic.

4.23. GT leasing can also reduce the practical control that a mobile network operator has over how its numbering resources are used. Contractual terms, due diligence, monitoring and signalling firewalls may reduce the risk of misuse, but they cannot remove the risk entirely. This is particularly the case where signalling traffic is not routed through the lessor's own network, where the lessor cannot directly monitor the signalling traffic generated by the lessee, or where lessees use SS7 messages which may be used for both legitimate and malicious purposes.

4.24. This reduction in transparency and control creates important trust issues which may have operational consequences for mobile network operators. Receiving mobile network operators may be unable to distinguish between legitimate and malicious traffic, or to determine whether the traffic has originated from a trusted or untrusted source. In response, they may take protective steps. Those steps may include treating traffic from particular GTs, operators or jurisdictions as higher risk, applying additional filtering, or blocking certain traffic.

4.25. Protective steps of that kind may affect legitimate services, including roaming, messaging and interconnection services provided to customers. In that way, misuse or suspected misuse of GTs may ultimately be detrimental to end-users.

4.26. The reputational risks are therefore significant, both for mobile network operators and for jurisdictions. If GTs associated with Guernsey numbering resources are used, or are suspected of being used, for malicious signalling, this can damage the reputation of the relevant Licensed Operator and of Guernsey as a jurisdiction. It may also undermine confidence in Guernsey's telecommunications sector and in Guernsey's use of +44 numbering resources.

4.27. There is also a specific risk arising from Guernsey's reliance on +44 numbering resources. Pursuant to section 11 of the Telecommunications (Bailiwick of Guernsey) Law, 2001[5], Ofcom administers the +44 numbering resources used by Licensed Operators in the Bailiwick[6]. As a consequence, Guernsey's telecommunications sector is dependent upon continued access to numbering resources administered within the wider +44 numbering environment.

4.28. Ofcom has itself concluded that GT leasing gives rise to significant security risks and has prohibited the practice within the United Kingdom. In doing so, Ofcom recognised that misuse of GTs can undermine trust and confidence in telecommunications signalling networks and create wider reputational concerns associated with numbering resources originating from a particular jurisdiction.

4.29. In those circumstances, misuse, or perceived misuse, of GTs associated with Guernsey has the potential to undermine confidence in the management and use of telecommunications resources allocated for use within the Bailiwick. Such concerns could give rise to increased regulatory scrutiny, reputational damage, or concerns regarding the appropriateness of existing arrangements through which Guernsey operators obtain access to +44 numbering resources.

4.30. Whilst the Authority is not aware of any present intention to restrict Guernsey's access to +44 numbering resources, the potential consequences of any loss of confidence in Guernsey-associated signalling resources would be significant. Given the importance of access to +44 numbering resources to the provision of telecommunications services within the Bailiwick, the Authority considers this to be a material risk which should be taken into account when assessing the practice of GT leasing.

Ofcom's Global Titles and Mobile Network Security Statement

4.31. As explained above, Ofcom has already undertaken significant work with regard to GT leasing. In July 2024, Ofcom consulted on proposals to strengthen its rules relating to Global Titles and mobile network security[7]. In April 2025, Ofcom published its decision to introduce new rules, including a prohibition on new GT leasing arrangements and a prohibition on the creation or use of GTs from sub-allocated numbers[8].

4.32. Ofcom's decision was based on its assessment that leased GTs create a material risk to mobile network security. In particular, Ofcom identified that leased GTs can provide third parties with access to global mobile signalling networks and can be misused to intercept or divert calls and messages, access information held by mobile networks, track the location of mobile users, facilitate fraud, and disrupt network services.

4.33. Ofcom also concluded that existing industry-led measures were insufficient to address the risks associated with GT leasing. Ofcom therefore decided that binding regulatory intervention was necessary to close what it considered to be a significant route through which malicious actors could obtain access to mobile signalling networks.

4.34. Ofcom's work is relevant to the GCRA's consideration for several reasons:

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[5] Telecoms Law, s.11(1) – "*The Authority may, in consultation with Ofcom and such other persons or bodies as it thinks fit, establish a numbering scheme in the Bailiwick*"

[6] T1677G - Guernsey Numbering Scheme Licence Modification - Final Decision_1.pdf

[7] Global Titles and Mobile Network Security

[8] Statement: Global Titles and Mobile Network Security

4.34.1. Ofcom administers the Guernsey Numbering Scheme pursuant to arrangements entered into with the GCRA under section 11(1A) of the Telecommunications (Bailiwick of Guernsey) Law, 2001[9]. Although Guernsey is a separate jurisdiction with its own legal and regulatory framework, Ofcom's views on the use of +44 numbering resources, including those used in Guernsey, are therefore an important consideration for the GCRA.

4.34.2. The evidence of risk and harm identified through Ofcom's consultation process is not confined to the UK. It is directly relevant to Guernsey because there is evidence of misuse associated with GTs allocated to, or used by, Guernsey Licensed Operators. Those matters are considered further in section 5.

4.34.3. Ofcom's decision creates a displacement risk for Guernsey. If GT leasing is prohibited in the UK, but remains available in Guernsey, Guernsey may be seen by threat actors as a route through which access to +44 GTs can still be obtained. That could increase the risk of GTs associated with Guernsey being used for, or associated with, malicious signalling activity.

4.35. The GCRA does not treat Ofcom's decision as determinative. The GCRA must reach its own view by reference to its statutory duties, the position in Guernsey, the evidence available to it, and the responses received to its own consultation. However, Ofcom's work is an important regulatory reference point and provides a relevant basis for the GCRA's consideration of whether equivalent measures are appropriate in Guernsey.

The GCRA's 2025 Consultation

4.36. In January 2025, the GCRA issued a consultation entitled "Proposals to Ban the Leasing of Global Titles from +44 numbers in Guernsey"[10]. The consultation explained the GCRA's concern that malicious use of GTs created using Guernsey +44 numbers could create serious risks for telecommunications customers, telecommunications networks, and Guernsey's jurisdictional reputation.

4.37. The consultation referred to concerns raised by Ofcom regarding the scale, control and purpose of GT leasing involving numbers assigned to Guernsey Licensed Operators. It also referred to concerns raised by the UK's National Cyber Security Centre, international reporting on SS7 misuse, GSMA material, Ofcom's July 2024 consultation, and information obtained from Enea regarding malicious signalling associated with Guernsey number ranges.

4.38. The January 2025 consultation set out the GCRA's provisional view that it should consider measures to reduce those risks. In particular, the GCRA consulted on whether it should prohibit Licensed Operators from leasing GTs to third parties, restrict the creation of GTs from sub-allocated or unallocated numbers, and introduce stronger compliance and monitoring obligations.

4.39. The purpose of the consultation was to gather information from stakeholders, understand the extent to which GT leasing or related arrangements were relevant to Guernsey Licensed Operators, identify the potential impact of a prohibition, and seek views on whether alternative measures could adequately address the risks identified.

[9] The GCRA has entered into an arrangement with Ofcom under section 11(1A) of the Telecommunications (Bailiwick of Guernsey) Law, 2001, under which Ofcom administers relevant +44 numbering resources for use in Guernsey.
[10] Case T1655G - Proposals to Ban the Leasing of Global Titles from +44 numbers in Guernsey - Consultation

4.40. The GCRA received responses from Sure (Guernsey) Limited ("Sure") and JT (Guernsey) Limited ("JT")[11][12]. The GCRA considered those responses when developing its Proposed Decision and has also taken them into account when reaching this Final Decision. In particular, the GCRA recognises the need to avoid unintended consequences for legitimate services which use GTs as an input, the need for clear licence drafting, and the need for a proportionate implementation period.

4.41. Both respondents agreed that GT misuse is a serious issue and that regulatory controls are needed. JT supported stronger rules to address the misuse of GTs and supported a prohibition on GT leasing to third parties, while also supporting a prohibition on the creation of GTs from sub-allocated numbers by third parties. Sure agreed that malicious signalling can cause significant harm and accepted that uncontrolled and unchecked GT leasing can create risks. Both respondents also considered that the GSMA Global Title Leasing Code of Conduct should be codified or made enforceable, supported by clear guidance, proportionate implementation arrangements, and measures to avoid unintended consequences for legitimate services which use GTs as an input.

4.42. However, Sure did not support an outright prohibition on GT leasing in Guernsey. Sure considered that a prohibition would be unnecessary and disproportionate, and argued instead for a more targeted control framework, including codification of the GSMA Global Title Leasing Code of Conduct, enhanced due diligence, route-via-lessor requirements, signalling firewall controls, monitoring, information-sharing and notification obligations.

4.43. Sure placed particular weight on the commercial and economic impact of a prohibition. Sure stated that GT leasing generated annual revenues of approximately £[✂] to £[✂], rising to an expected £[✂] per annum by the end of 2028. Sure also identified wider revenue and investment impacts, including expected revenue associated with [✂], which it said could rise to approximately £[✂] per annum by the end of 2028. Sure argued that the loss of these revenues would [✂].

4.44. Having considered the consultation responses and the further material available to it, the GCRA concluded that GT leasing creates risks which are not adequately addressed by existing controls. The GCRA also noted that the regulatory position had continued to develop, including through Ofcom's Final Decision and the policy position communicated by the States of Guernsey.

The GCRA's 2026 Proposed Decision

4.45. On 17 July 2026, the GCRA published a Proposed Decision setting out its provisional view that regulatory intervention was required to address the risks associated with GT leasing.

4.46. The Proposed Decision drew upon evidence obtained through the GCRA's January 2025 consultation, information concerning the misuse of GTs internationally and within the Bailiwick, analysis of the security characteristics of SS7 signalling networks, and the wider regulatory developments that had occurred in the United Kingdom and Jersey. Having considered this evidence, the GCRA provisionally concluded that GT

[11] Non-confidential versions of these responses have been added to the GCRA's website and can be found using the following link: Proposals to Ban the Leasing of Global Titles in Guernsey | The Guernsey Competition and Regulatory Authority

[12] In its response, JT confirmed that it does not lease GTs using its Guernsey allocated number ranges.

leasing increases the risk of malicious signalling activity and can result in significant harms to consumers, telecommunications networks and the reputation of the Bailiwick. The Proposed Decision therefore proposed licence modifications that would prohibit GT leasing from 1 May 2027.

4.47. The Proposed Decision also proposed licence modifications intended to support the prohibition of GT leasing and to address the risks associated with telecommunications services capable of generating malicious signalling.

4.48. The consultation period closed on 28 August 2026. At Sure's request, the GCRA agreed an extension to 4 September 2026 for the submission of Sure's response. The GCRA subsequently received a response from Sure[13], which did not challenge the evidence of harm or the need for regulatory intervention, but raised concerns regarding certain aspects of the proposed measures.

4.49. In particular, Sure:

- argued that the proposed implementation date of 1 May 2027 should be extended by a further six to 12 months;
- requested additional exemptions from the GT leasing prohibition for certain use cases;
- objected to the proposed licence conditions relating to services capable of generating malicious signalling; and
- raised concerns regarding the proposed notification obligations.

4.50. On 29 September 2026, Case Officers met with representatives of Sure to better understand the issues raised in its response and obtain further information regarding the operational, commercial and technical considerations identified by the Licensee.

4.51. The GCRA has carefully considered Sure's response and the information provided during subsequent engagement. The Authority's assessment of those representations, and its conclusions, are set out in Section 7 of this Final Decision.

4.52. The background set out above explains both the legitimate role played by GTs within mobile telecommunications networks and the reasons why regulators have become increasingly concerned about the risks associated with GT leasing. The Authority now turns to the evidence of misuse and the specific risks which arise from the practice.

[13] Sure response to GCRA's Global Title Leasing – Proposed Decision – 4 September 2026

5. MISUSE OF GLOBAL TITLES

5.1 The previous section explained the role of GTs in telecommunications networks, the practice of GT leasing, and the reasons why regulators have become concerned about the risks associated with that practice. This section considers evidence that those risks are not merely theoretical and that GTs have been misused, or associated with misuse, both internationally and in ways that are relevant to the Bailiwick of Guernsey.

5.2 The examples of GT misuse described below were set out in detail in the Proposed Decision and formed part of the evidential basis upon which the GCRA reached its provisional conclusions. No respondent disputed the occurrence of these events, challenged the underlying evidence relied upon by the GCRA, or suggested that the examples were not relevant to the Authority's assessment. Accordingly, the GCRA remains satisfied that these examples provide relevant evidence of the ways in which GTs can be misused and has therefore retained them in this Final Decision.

International Evidence of Misuse

5.3 Recent open-source reporting and security research have identified examples in which GTs, including leased GTs, or other forms of access to mobile signalling networks have been associated with location tracking, interception or diversion of communications, suspicious signalling queries, and other forms of misuse.

5.4 The GCRA treats open-source reporting with appropriate caution. However, those sources are relevant because they show that the types of harm associated with GT leasing have been observed in practice and have been investigated by journalists, security researchers and mobile network operators.

5.5 In May 2023, Lighthouse Reports published an investigation into [✂][14]. The reporting described a surveillance apparatus capable of exploiting mobile network protocols to track mobile users and redirect SMS messages, and highlighted the role of leased access to mobile signalling infrastructure in enabling such activity. Lighthouse Reports stated that access to GTs, whether directly held or obtained through leasing arrangements, allowed third parties to send signalling messages that appeared to originate from legitimate operators. The reporting described examples including alleged location tracking in the Democratic Republic of the Congo, SMS redirection in Southeast Asia and Israel, and an attempt to obtain personal and location data from a journalist's phone in Mexico.

5.6 In August 2023, the Organized Crime and Corruption Reporting Project and the Australian Broadcasting Corporation reported that GTs associated with [✂] had likely been used by private surveillance actors to track individuals and obtain data[15]. The reporting stated that [✂] GTs from Fiji, Papua New Guinea, Samoa, Tonga and Vanuatu had been used to lodge more than 21,000 suspicious queries in the 12 months to July 2023, many of which were designed to identify individual phones or locate them. The reporting also stated that [✂], which had acquired [✂], had terminated most [✂] GT leases and cancelled an additional lease after the issue was raised by journalists.

[14] Ghost in the network - Lighthouse Reports

[15] Australia-Owned Pacific Telco Likely Exploited by Private Spies | OCCRP

5.7 In October 2025, Lighthouse Reports published an investigation into [✂], an Indonesian phone-tracking company, and its [✂] surveillance tool[16]. Lighthouse Reports reported that signalling messages used for this type of activity are sent and received by GTs, and that surveillance companies have often leased GTs from mobile operators in order to send unauthorised signalling messages into other networks while appearing to originate from the legitimate operator which owns the GT. Lighthouse Reports also reported that [✂] used GTs provided through local operator links and, in some cases, GTs from [✂] to carry out large numbers of location-tracking queries.

5.8 The GCRA considers that these examples are relevant because they corroborate the risks identified in the previous section. In particular, they show that GTs and leased access to mobile signalling networks can be used to generate traffic that appears to originate from a trusted operator; that the true source, purpose and control of that traffic may be difficult to identify; and that the resulting harms may include location tracking, SMS interception or redirection, access to subscriber information, and other forms of surveillance or misuse.

5.9 The GCRA does not rely on these examples as determinative of the position in Guernsey. However, they demonstrate that the risks associated with GT leasing have materialised internationally. They therefore provide relevant context for the GCRA's assessment of the evidence concerning Guernsey-related GTs in the next section.

5.10 In addition to open-source reporting on GT misuse, the GCRA has received information from other regulators and network security specialists indicating that misuse of GTs is pervasive and persistent, and is frequently associated with the exploitation of commercially leased access to numbering resources and signalling infrastructure. That information indicates that +44 GTs are among the most common sources of high-risk and malicious signalling traffic, including GTs allocated to telecommunications providers in the Channel Islands.

5.11 That information also substantiates much of the open-source reporting referred to above. In particular, it indicates that threat actors such as [✂], [✂] and [✂] have been reported or assessed as having exploited GT leasing arrangements, often at scale and across multiple jurisdictions, in order to gain access to global mobile networks and undertake malicious activity, including location tracking, interception and information retrieval.

5.12 Taken together, the open-source and confidential material supports the GCRA's view that GT misuse is widespread and persistent, and that a significant proportion of that misuse is associated with commercial GT leasing arrangements.

5.13 Whilst the international examples described above demonstrate that GT leasing has been associated with misuse in multiple jurisdictions, the GCRA considers it particularly important to understand whether similar concerns arise in relation to Guernsey and the Channel Islands.

Guernsey Evidence of Misuse

5.14 The GCRA also considered evidence that the risks associated with GT leasing have materialised in a manner that is directly relevant to Guernsey and the Channel Islands. In particular, public reporting, security

[16] How First Wap Tracks Phones Around the World - Lighthouse Reports

research, expert evidence provided to the GCRA, and information obtained from UK authorities have associated Guernsey and Channel Islands GTs, or related signalling infrastructure, with misuse or suspected misuse.

5.15 In December 2020, the Guardian and the Bureau of Investigative Journalism reported that private intelligence companies had used, or appeared to have used, Channel Islands mobile networks to enable surveillance operations against mobile users around the world[17]. In particular, the reporting referred to an intermediary which allegedly leased an access point via [✂] in the first half of 2018, potentially enabling the tracking of mobile phone locations.

5.16 The Bureau of Investigative Journalism also reported that Channel Islands networks had been used in signalling activity associated with attempts to locate [✂] in March 2018. The reporting stated that signals designed to reveal phone location were sent via mobile networks in Jersey, Guernsey and other jurisdictions, including via Jersey Airtel and networks in other jurisdictions.

5.17 The same reporting referred to aggregated data showing a wider pattern of signalling intrusions from Channel Islands networks into phone networks worldwide. This included reports of hundreds of intrusion attempts sent via [✂] and [✂] (which is now part of the [✂]) into networks in North America, Europe and Africa in August 2020.

5.18 The Guardian also reported that a US mobile phone user was allegedly tracked while travelling in Bangladesh in August 2020, and that the apparent surveillance attack appeared to have been routed through [✂][18]. The reporting stated that the signalling messages could have been used to pinpoint the person's location or intercept communications.

5.19 In April 2026, Citizen Lab published research concerning covert surveillance activity using mobile operator signalling infrastructure[19]. Citizen Lab identified [✂] as relevant Channel Islands infrastructure and stated that [✂], now part of [✂], had been seen as the first hop for Diameter signalling surveillance queries, with further surveillance dating back to the 2022 timeframe.

5.20 In addition to open-source intelligence, the GCRA has engaged with experts in mobile network security and relevant UK authorities to understand the threat posed by GT leasing activity in Guernsey.

5.21 In October 2024, the GCRA engaged with Enea[20], a specialist provider of mobile network security analysis, to understand the current and potential future threat posed by GT leasing by Guernsey-based operators. Enea provided information indicating that GTs leased from Guernsey number ranges had been identified as the source of malicious signalling in the global telecommunications network[21].

5.22 The Enea Signalling Intelligence Reports also identified that a GT leased from a Guernsey number range had, historically, been used by [✂], which Enea considered to be an actor or attack group capable of conducting signalling attacks over both SS7 and Diameter.

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[17] Spy companies using Channel Islands to track phones around the… | TBIJ

[18] Israeli spy firm suspected of accessing global telecoms via Channel Islands | Espionage | The Guardian

[19] Bad Connection: Uncovering Global Telecom Exploitation by Covert Surveillance Actors - The Citizen Lab

[20] AI-Powered Software for Telecom Networks & Cybersecurity

[21] The GCRA obtained Enea's Signalling Intelligence Layer reports to evidence the risks and harms associated with leasing Global Titles from +44 number ranges.

5.23 The report is relevant to Guernsey because Enea identified [✂], together with [✂], as part of a set of SS7 GTs re-attributed to [✂] control. Enea also identified the [✂] as one of the malicious sources previously most commonly linked to a [✂] node used in the November 2023 attack. The GCRA considers this significant because it links Guernsey and Channel Islands GTs to signalling infrastructure associated with an actor assessed by Enea to be capable of malicious signalling activity.

5.24 The GCRA engaged with Ofcom throughout 2026 regarding the misuse, or suspected misuse, of GTs associated with Guernsey and the wider +44 numbering environment. Ofcom has informed the GCRA that GTs created from +44 number ranges, whether used in the UK or the Crown Dependencies, have been a significant source of malicious signalling globally.

5.25 As part of that engagement, Ofcom identified at least 28 recent examples of potentially malicious or suspicious signalling from GTs listed as associated with [✂]. Ofcom explained that this activity included signalling consistent with attempts to identify subscriber information or locate mobile users on their home or roaming networks.

5.26 The GCRA considers this information to be significant because it indicates that concerns regarding Guernsey-linked GTs are not limited to historic public reporting or earlier expert analysis. Rather, Ofcom's recent engagement with the GCRA has identified potential current instances of suspicious signalling associated with Guernsey-allocated GTs, demonstrating that the risks identified in this Decision remain present and relevant.

5.27 Finally, as part of its evidence gathering, the GCRA was provided with a report prepared by Enea for Ofcom's Global Titles and Mobile Network Security work item. Ofcom referred to this report as the "Enea Report" or the "Enea State of the Nation Report"[22] in its consultation and statement documents[23].

5.28 The Enea Report identified the UK as one of the most significant and persistent sources of high-risk and malicious signalling. It also identified [✂] as a significant source of malicious activity. In particular, the report stated that [✂] GTs had been used by a variety of threat actors, including [✂] and [✂], to facilitate attacks in Europe, LATAM, Africa, MENA and Asia. The activity identified included subscriber location tracking, information retrieval and, on occasion, interception. In some cases, [✂] GTs were identified as forming part of coordinated attacks involving GTs from other countries.

5.29 The report also identified a [✂] GT as undertaking network reconnaissance activity in several markets over a four-year period.

5.30 Taken together, the evidence set out above demonstrates that the risks associated with GT leasing are not theoretical. The evidence shows that GTs associated with the Channel Islands, including Guernsey, have been linked to suspicious, high-risk and malicious signalling activity. The GCRA considers this evidence significant because it demonstrates that the harms identified in Section 4 have materialised in practice and can affect telecommunications resources associated with the Bailiwick. The evidence therefore supports the need for regulatory intervention to reduce the risk of future misuse.

[22] Enea, March 2024. Signalling Intelligence Layer – State of the Nation Report for Ofcom (unpublished)
[23] Consultation: Global Titles and Mobile Network Security

6. POLICY POSITION OF THE STATES OF GUERNSEY

6.1. On 14 July 2026, the Presidents of the Committee for Home Affairs and the Committee for Economic Development wrote to the GCRA regarding the leasing and sub-leasing of GTs in Guernsey.

6.2. The letter explained that the Committee for Home Affairs had considered the security concerns associated with GT leasing, including the potential for misuse to facilitate serious criminal activity, fraud and other telecommunications-enabled offending. The letter stated that the Committee had determined that GT leasing and sub-leasing should cease in the Bailiwick. The Committee for Economic Development confirmed that it concurred with that position.

6.3. The letter requested that the GCRA consider modifying telecommunications licences to bring about the cessation of GT leasing in Guernsey. It also stated the States' expectation that, from 1 May 2027, no further GT leases should be granted, and all existing GT leasing arrangements should cease.

6.4. The letter also recognised that any compliance and enforcement arrangements should be clear, proportionate and appropriately targeted. In particular, the GCRA understands the States' position to be that any intervention should be focused on the harmful activity identified, whilst recognising that there may be legitimate services which use location or signalling-related inputs and that alternative arrangements may be available which do not rely on GT leasing or SS7 signalling access.

6.5. Following receipt of Sure's response to the Proposed Decision, the GCRA sought clarification from the States regarding whether there was any flexibility in the implementation date identified in the letter. This was relevant to the GCRA's consideration of Sure's request for an extended implementation period and formed part of the Authority's assessment of proportionality. The States subsequently confirmed that the position communicated in the letter remained unchanged and that the Committees had not agreed any flexibility to the 1 May 2027 deadline.

6.6. The GCRA has had regard to the position of the States of Guernsey in reaching this Final Decision. The Authority considers the letter to be an important policy and public-interest consideration, particularly given the security and law-enforcement concerns identified by the Committee for Home Affairs and the economic and regulatory interests identified by the Committee for Economic Development.

6.7. However, the GCRA has not treated the letter as determinative of its decision. The GCRA must reach its own conclusions in accordance with its statutory duties, the Telecommunications (Bailiwick of Guernsey) Law, 2001, the Regulation of Utilities (Bailiwick of Guernsey) Law, 2001, any applicable States' Directions, the principles of economic regulation, and the evidence available to it.

7. PROPOSALS, CONSULTATION RESPONSES, AND GCRA DECISION

7.1. GTs play an important role in the operation of telecommunications networks and support a range of legitimate and beneficial services. However, the evidence considered by the GCRA also demonstrates that GTs, and in particular leased GTs, have been used in connection with malicious signalling activity and that such activity is capable of causing significant harm to consumers, telecommunications networks, telecommunications providers and jurisdictions.

7.2. Evidence available to the GCRA indicates that malicious signalling activity has historically been associated with telecommunications resources allocated for use within the Bailiwick of Guernsey and, if left unaddressed, may result in harm to individuals, damage to the reputation of the Bailiwick, and adverse impacts on its wider economic interests. In the GCRA's view, such risks are unacceptable and necessitate regulatory intervention consistent with the Authority's statutory duties.

7.3. The Proposed Decision therefore provisionally concluded that regulatory intervention was required to address the risks associated with GT leasing. In particular, the GCRA provisionally concluded that:

- GT leasing should be prohibited from 1 May 2027 as the most effective means of addressing the risks identified by the GCRA;
- exemptions should be limited to circumstances which do not undermine the effectiveness of the prohibition;
- additional licence conditions should be introduced to address risks associated with telecommunications services capable of generating malicious signalling; and
- Licensees should be subject to notification obligations where they become aware of malicious signalling activity.

7.4. The GCRA received a response from Sure (Guernsey) Limited in relation to the Proposed Decision and subsequently met with representatives of Sure to better understand the issues raised[24]. Whilst Sure did not dispute the evidence of harm relied upon by the GCRA, it argued that a controls-based framework would be preferable to an outright prohibition and raised concerns regarding aspects of the proposed regulatory framework, including the implementation period, proposed exemptions and additional licence conditions.

7.5. The GCRA has carefully considered those representations together with the wider evidence available to it. This section sets out the Authority's assessment of each of the principal proposals contained in the Proposed Decision, summarises the representations received, and explains the reasons for the Authority's final conclusions.

Prohibition of GT Leasing

7.6. As explained in Sections 4 to 6 of this Final Decision, the GCRA's primary concern is that GT leasing increases the risk of malicious signalling activity by extending access to mobile signalling capabilities beyond the entities responsible for operating telecommunications networks.

[24] Meeting between Sure (Guernsey) Limited and GCRA Case Officers on 29 September 2026.

7.7. Whilst GT leasing has historically been used to support a range of legitimate services, the GCRA's assessment is that the practice gives rise to significant security, operational, consumer protection and reputational risks. Such risks may result in harm to individuals, undermine trust between mobile network operators, and damage the reputation and economic wellbeing of the Bailiwick.

Proposed Decision

7.8. The Proposed Decision provisionally concluded that it was necessary, appropriate, and proportionate to prohibit GT leasing in the Bailiwick of Guernsey.

7.9. That conclusion was informed by the evidence considered throughout the GCRA's January 2025 consultation, the information subsequently obtained from Ofcom, Enea and other authorities, the evidence of misuse described in Section 5 of this Final Decision, and the policy position communicated by the States of Guernsey.

7.10. As explained in the Proposed Decision, the GCRA's concern was not that GTs themselves are problematic. GTs perform an important and legitimate role within mobile telecommunications networks and support services relied upon by consumers on a daily basis. Rather, the GCRA's concern was that GT leasing extends access to mobile signalling capabilities beyond the telecommunications operators responsible for holding and controlling the underlying numbering resources. In doing so, GT leasing alters the trust relationships upon which signalling networks have historically relied and creates additional opportunities for telecommunications networks to be misused.

7.11. These concerns arise partly from the characteristics of the SS7 signalling environment itself. SS7 was developed on the assumption that signalling traffic would generally originate from a relatively small number of known and trusted telecommunications operators. GT leasing allows signalling traffic to originate from entities other than the holder of the GT, whilst continuing to benefit from the trust and reputation associated with that GT. As a result, other network operators may be unable to identify the true source, controller or purpose of signalling traffic, making suspicious or malicious signalling activity more difficult to identify, attribute, investigate and prevent.

7.12. The Proposed Decision also explained that GT leasing can reduce transparency and accountability within signalling networks. Whilst contractual controls, due diligence requirements, monitoring arrangements and signalling firewalls may help reduce the likelihood of misuse, they do not remove the underlying fact that signalling capabilities have been made available to a third party. Such controls may additionally be less effective where signalling traffic is generated outside the direct visibility or control of the lessor, where GTs are onward leased, or where signalling messages may be used for both legitimate and malicious purposes.

7.13. In assessing whether intervention was necessary, the GCRA also considered the evidence of misuse available to it. The Authority identified evidence of GT misuse internationally and evidence linking telecommunications resources associated with Guernsey and the wider Channel Islands to suspicious and potentially malicious signalling activity. The GCRA therefore provisionally concluded that the risks associated with GT leasing were not merely theoretical. Rather, the available evidence demonstrated that signalling capabilities obtained through GT leasing arrangements have been used, or suspected of being used, in connection with activities such as subscriber location tracking, information retrieval, interception and broader surveillance activity.

7.14. The GCRA further considered that the risks associated with GT leasing extend beyond direct consumer harm. The Proposed Decision explained that misuse or suspected misuse of GTs can damage confidence in telecommunications resources associated with a particular operator or jurisdiction. Given the evidence linking Guernsey and wider Channel Islands telecommunications resources to signalling misuse, the GCRA considered that continued GT leasing created a material risk to the reputation of the Bailiwick and its telecommunications sector. The GCRA was also concerned that such misuse could have wider implications for the Bailiwick's economic interests and its standing as a trusted jurisdiction.

7.15. Having provisionally concluded that regulatory intervention was necessary, the GCRA then considered the form that such intervention should take. In doing so, the GCRA recognised that GT leasing has historically been used to support a variety of legitimate services and that operators and third parties may derive commercial and operational benefits from GT leasing arrangements. The GCRA also recognised that some end-users may indirectly benefit from services facilitated through leased GTs and that prohibition would therefore have commercial consequences for operators, GT lessees and their customers.

7.16. The GCRA further recognised that a prohibition on GT leasing would affect existing business models and could give rise to implementation costs. In particular, the GCRA was aware that certain Licensed Operators derive revenue from GT leasing activities and that alternative technical and commercial arrangements may need to be developed and implemented. For example, Sure had stated that GT leasing generated annual revenues of approximately £[✂] to £[✂], rising to an expected £[✂] per annum by the end of 2028. Sure also referred to wider revenue associated with [✂], which it said could rise to approximately £[✂] per annum by the end of 2028[25].

7.17. However, the GCRA provisionally concluded that those impacts were outweighed by the benefits of prohibition. In particular, prohibition would materially reduce the risk of Guernsey-associated GTs being used to generate malicious or suspicious signalling and therefore reduce the risk of harm to end-users, telecommunications providers and the Bailiwick. The GCRA also considered that prohibition would reduce the reputational and operational risks faced by Licensed Operators, support confidence in Guernsey's use of +44 numbering resources, and help protect the reputation of the Bailiwick as a well-regulated jurisdiction.

7.18. The GCRA additionally considered that the adverse impacts of prohibition were mitigated by the availability of alternative approaches capable of supporting a number of use cases currently facilitated through GT leasing. Although such alternatives may require investment, technical development and customer migration, the GCRA provisionally concluded that prohibition would not prevent Licensed Operators from continuing to support legitimate customer requirements through alternative technical and commercial arrangements. The GCRA also considered that the proposed implementation period would provide affected operators with an opportunity to identify, develop and implement appropriate alternatives.

7.19. The GCRA further considered whether a controls-based framework, such as the approach proposed by Sure, would represent a more appropriate or proportionate alternative. The GCRA provisionally concluded that it would not. Whilst enhanced due diligence, monitoring, contractual controls, information sharing and technical safeguards may reduce the likelihood of misuse, they would not address the underlying trust and

[25] In the Proposed Decision, the GCRA noted that it places greater weight on current and reasonably foreseeable revenue than on projected future revenue. The Authority also considers that revenue associated with activity which gives rise to consumer, security or reputational harms should be given limited weight when assessing proportionality. The GCRA therefore considers Sure's current GT leasing revenues to be a more relevant indicator of impact than forecast future revenues.

transparency concerns associated with GT leasing. Such a framework would also require ongoing regulatory oversight, specialist technical expertise, additional compliance and enforcement activity, and continued monitoring of a high-risk activity. The GCRA therefore provisionally concluded that prohibition represented the most effective, proportionate and administratively efficient means of addressing the identified risks.

7.20. The GCRA also considered that such a framework would be more costly to administer, would require ongoing specialist supervision and intelligence gathering, and would ultimately increase regulatory costs which would be borne by Licensed Operators through the Authority's licence fee framework[26]. By contrast, a prohibition on GT leasing is not expected to require the same ongoing supervisory framework or materially increase the GCRA's costs.

7.21. Taking these matters together, the Proposed Decision provisionally concluded that a prohibition on GT leasing represented the most effective, appropriate and proportionate means of reducing the identified risks. The GCRA therefore proposed to prohibit GT leasing.

Responses to Proposed Decision

7.22. The GCRA received one response to its proposal to prohibit GT leasing from Sure.

7.23. Sure explained that its preferred approach remained a controls-based framework which aligns with the GSMA FS.52 Global Title Leasing Code of Conduct[27]. However, Sure also acknowledged that significant regulatory and policy development which had occurred since January 2025, including the States of Guernsey's policy position that GT leasing should be prohibited. In light of those developments, Sure did not expressly challenge the GCRA's provisional conclusion that GT leasing should be prohibited and instead focused its response on the practical implications of such a prohibition.

7.24. Sure did not challenge the evidence of harm relied upon by the GCRA, nor did it make substantive representations that GT leasing should continue indefinitely. Instead, Sure submitted that, should a prohibition be progressed, sufficient time should be provided to enable existing GT leasing arrangements to transition to appropriate alternative solutions[28].

GCRA Assessment

7.25. The GCRA has carefully considered Sure's response to the Proposed Decision and the information subsequently provided by Sure during engagement with Case Officers.

7.26. The Authority notes that neither Sure, nor any other Licensee or stakeholder, challenged the evidence of harm relied upon by the GCRA, the evidence of misuse considered in Sections 4 and 5 of this Final Decision, or the States of Guernsey's policy position that GT leasing should cease. Similarly, no respondent disputed the GCRA's assessment that GT leasing gives rise to significant security, consumer protection, operational and reputational risks.

7.27. However, the GCRA notes Sure's preference that a controls-based framework aligned with GSMA best practice be adopted instead of an outright prohibition. In light of Sure's position, the GCRA has further

[26] The GCRA estimates that the cost of establishing and operating such a framework, including staff costs, third party consultancy, and monitoring tools, could amount to hundreds of thousands of pounds per year.

[27] FS.52 2.0 – Global Title Leasing Code of Conduct - Security

[28] Sure response to GCRA's Global Title Leasing – Proposed Decision – 4 September 2026 – para. 5 - 6

considered whether a controls-based framework would represent a more appropriate or proportionate response to the risks identified. Having done so, the GCRA remains of the view that, for the reasons set out in the Proposed Decision, it would not.

7.28. First, a controls-based framework would not address the underlying trust and transparency concerns arising from the provision of GTs and signalling capabilities to third parties. Whilst enhanced due diligence, contractual controls, information-sharing arrangements, monitoring obligations and signalling firewalls may reduce the likelihood of misuse, they cannot eliminate the fundamental risks associated with extending signalling capabilities beyond entities responsible for operating telecommunications networks. This is evidenced by the 28 instances of potentially malicious or suspicious signalling identified by Ofcom in 2026 involving GTs associated with [✂]. Furthermore, the evidence of misuse considered by the Authority over the last two years has arisen during a period in which Channel Islands Licensed Operators have already operated enhanced administrative and technical controls. In the view of the Authority, this demonstrates that such controls are not sufficient to prevent misuse or adequately address the risks and harms associated with GT leasing. The Authority therefore remains of the view that a controls-based framework may reduce risk, but would not provide an effective solution to the concerns identified in this Decision.

7.29. Secondly, the GCRA remains concerned that misuse may not always be detected, investigated or prevented before harm occurs. Signalling misuse is often difficult to identify in real time and may only become apparent after harm has already arisen. This is particularly the case where signalling units can be used for both legitimate and harmful purposes, and it can be difficult for a network operator to distinguish between those purposes. GT leasing would therefore create ongoing risks to consumers, telecommunications providers, confidence in the Bailiwick's use of +44 numbering resources and the reputation of Guernsey as a trusted and well-regulated jurisdiction. The GCRA considers these concerns particularly significant in light of the evidence of misuse associated with Guernsey and wider Channel Islands telecommunications resources described in Section 5.

7.30. Finally, the GCRA remains of the view that a controls-based framework would be less practical, less proportionate and less effective than a prohibition. As explained in the Proposed Decision, effective supervision of GT leasing would require the GCRA to oversee a technically complex and high-risk activity on an ongoing basis. This would necessitate specialist technical expertise, access to external security intelligence, enhanced compliance monitoring and periodic enforcement activity.

7.31. The GCRA is not currently resourced to undertake that level of supervision. Establishing the capabilities necessary to effectively regulate GT leasing would require significant additional resource, time and expenditure. Those costs would ultimately need to be recovered through the Authority's licence fee framework and would therefore be borne by Licensed Operators, including those which do not engage in GT leasing activities.

7.32. The GCRA does not consider it appropriate to impose those costs on industry in order to supervise a framework which would remain less effective than a prohibition. Even with enhanced controls and ongoing regulatory oversight, GT leasing would continue to present the trust, transparency and misuse risks identified in this Decision. The Authority therefore remains of the view that prohibition represents a more effective, proportionate and administratively efficient means of addressing those risks.

Conclusion

7.33. Having considered the responses received, the GCRA remains satisfied that the reasoning set out in the Proposed Decision continues to support prohibition of GT leasing to third parties. The Authority accepts that prohibition will require affected operators to transition existing arrangements and implement alternative solutions. However, it has not been provided with evidence or arguments which would justify departing from its provisional conclusions.

7.34. In particular, the GCRA remains of the view that alternative courses of action, including a controls-based framework, would be less effective, more costly and would result in greater residual risk than a prohibition. The GCRA therefore remains satisfied that prohibition represents the most effective, appropriate and proportionate means of addressing the risks associated with GT leasing.

7.35. The GCRA therefore concludes that prohibiting GT leasing to third parties is necessary, appropriate and proportionate, and remains the most effective means of addressing the risks identified in this Final Decision. GT leasing by Licensed Operators to third parties shall therefore be prohibited.

Prohibiting the Creation and Use of GTs from Sub-Allocated Numbers

7.36. The Proposed Decision also proposed to prohibit the creation or use of GTs from numbers sub-allocated under condition [X.3(b)] of Part VI of the Telecommunications Licence.

7.37. As explained in the Proposed Decision, this measure was intended to prevent circumvention of the GT leasing prohibition. Without such a restriction, a third party could potentially obtain access to sub-allocated numbers and use those numbers to create and operate GTs. In practice, this could result in a third party obtaining access to signalling capabilities through Guernsey-associated numbering resources in a manner which is materially similar to GT leasing.

7.38. The Proposed Decision therefore concluded that prohibiting the creation or use of GTs from sub-allocated number ranges was necessary to ensure that the GT leasing prohibition was effective and that the risks associated with third-party access to signalling capabilities were not reintroduced through alternative arrangements.

Responses to Proposed Decision

7.39. The GCRA did not receive any representations regarding the proposal to prohibit the creation or use of GTs from sub-allocated number ranges.

GCRA Assessment

7.40. In the absence of any representations on this proposal, the GCRA remains satisfied that this measure is necessary to support the effectiveness of the GT leasing prohibition.

7.41. The GCRA remains concerned that, in the absence of such a restriction, sub-allocation arrangements could be used in a manner which replicates many of the characteristics and risks associated with GT leasing. Such an outcome would undermine the effectiveness of the prohibition and create a route through which third parties could continue to obtain access to signalling capabilities associated with Guernsey numbering resources.

7.42. The GCRA has not received any evidence or representations suggesting that the proposal is unnecessary, disproportionate or likely to give rise to material adverse consequences.

Conclusion

7.43. The GCRA therefore concludes that prohibiting the creation or use of GTs from sub-allocated number ranges is necessary, appropriate and proportionate. The Authority considers this measure to be an important component of the wider GT leasing prohibition and necessary to prevent its circumvention.

Exemptions to the GT Leasing Prohibition

7.44. In this section, the GCRA explains its decision regarding exemptions to the GT leasing prohibition. Whilst the GCRA has concluded that certain limited exemptions are necessary and appropriate, it is also mindful that exemptions have the potential to undermine the effectiveness of the prohibition if they permit third parties to continue accessing signalling capabilities in a manner which gives rise to the same risks that the prohibition is intended to address. Accordingly, the GCRA has been careful to ensure that any exemptions remain narrow in scope and do not undermine the objectives or intended outcomes of the prohibition of GT leasing to third parties.

Proposed Decision

7.45. The Proposed Decision provisionally concluded that GT leasing should be prohibited, subject only to a limited number of narrowly drafted exceptions contained within proposed condition [X.15] of Annex A.

7.46. As explained in the Proposed Decision, those exceptions were intended to reflect specific circumstances in which the use of a GT remained sufficiently connected to the Licensed Operator to avoid the risks and concerns associated with GT leasing by third parties. Accordingly, the Proposed Decision provided that a Licensee may authorise the use of a GT only where the authorised person is:

a. a Subsidiary, Wholly-Owned Subsidiary or Holding Company of the Licensee; or

b. a person supplying services to the Licensee and using the GT exclusively for the purpose of providing those services to the Licensee.

7.47. The GCRA considered that these limited exceptions were necessary to permit normal corporate group structures and operational arrangements whilst ensuring that GTs remained under the effective control and oversight of the Licensed Operator to which the underlying numbering resources had been allocated.

7.48. The Proposed Decision did not propose broader exemptions. The GCRA's provisional view was that permitting wider categories of GT leasing could undermine the effectiveness of the prohibition, reintroduce the risks identified elsewhere in this Decision, and create opportunities for circumvention of the proposed licence conditions.

Responses to the Proposed Decision

7.49. In its written response to the Proposed Decision, Sure requested that the list of exempted activities be expanded to include three additional categories of activity. Sure subsequently provided further information

regarding those requests during a meeting with GCRA Case Officers on 29 September 2026, including the technical, operational and commercial considerations which it considered justified additional exemptions.

7.49.1. First, Sure requested an exemption for certain MVNO arrangements, which it described as an "IMSI leasing" exemption. Sure explained that the exemption was required to support an existing local MVNO arrangement involving Coop Mobile. According to Sure, [✂]. Sure submitted that, in the absence of such an arrangement, [✂] and that alternative approaches would require significant technical development, testing or operational changes[29].

7.49.2. Secondly, Sure requested an exemption for network extension services. Sure explained that these arrangements involve service providers [✂]. Sure submitted that requiring those providers to utilise their own numbering resources or establish independent roaming arrangements would be operationally complex, could reduce the effectiveness of existing services, and would diminish the commercial rationale for the arrangements. Sure further noted that [✂][30].

7.49.3. Thirdly, Sure requested an exemption for penetration testing activities. Sure explained that the exemption would permit GT leasing services to be provided to specialist penetration testing providers undertaking security testing activities on behalf of third parties. Sure submitted that this represents a legitimate use case and argued that the associated risks could be managed through measures such as letters of authority, controlled customer lists, defined testing windows, monitoring and logging arrangements[31].

7.50. Sure's position was that each of these use cases involved legitimate activities and that appropriate controls could be implemented to mitigate the associated risks. Sure therefore considered that the addition of further exemptions would not undermine the objectives of the GT leasing prohibition.

GCRA Assessment

7.51. As explained above, the GCRA's starting position is that exemptions to the GT leasing prohibition should be limited and narrowly drafted. This is because exemptions create a risk that the prohibition may be circumvented and that the risks identified throughout this Final Decision may continue to arise despite the prohibition. The GCRA also considers that broader exemptions would increase complexity, create uncertainty regarding the scope of the prohibition, and require ongoing regulatory supervision and enforcement activity.

IMSI Leasing for MVNOs

7.52. The GCRA has nevertheless given careful consideration to Sure's request for an exemption relating to its arrangements with Coop Mobile. In doing so, the GCRA has recognised that the arrangement is materially different from many other GT leasing arrangements, as it relates to a local MVNO serving customers in the Bailiwick and may affect [✂].

7.53. The GCRA understands that Coop Mobile currently [✂]. The GCRA accepts that removal of the existing GT leasing arrangement in this scenario before an alternative solution is implemented could have adverse

[29] Sure response to GCRA's Global Title Leasing – Proposed Decision – 4 September 2026 – para 18 - 21
[30] Ibid – para. 22 - 23
[31] Ibid – para. 24 - 26

consequences for Coop Mobile and its customers. The Authority also considers that disruption to Coop Mobile's ability to [✂] could adversely affect competition in the Bailiwick's mobile market.

7.54. However, having considered the information provided by Sure, and received advice from technical case officers from Ofcom, the GCRA is not satisfied that GT leasing is necessary to support this use case. In particular, the GCRA understands that a number of alternative solutions exist which would enable online charging functionality to continue without requiring GT leasing. These alternatives include:

7.54.1. migration to a fully hosted or "thin" MVNO model which utilises Sure's charging and billing platforms;

7.54.2. the use of API-based arrangements through which charging instructions can be exchanged between Coop Mobile and Sure without providing the MVNO with direct access to signalling capabilities;

7.54.3. GT modification or translation approaches; or

7.54.4. the establishment of independent numbering and signalling arrangements, including the allocation of independent numbering resources and the establishment of an independent IR.21.

7.55. The GCRA considers an API-based approach to be particularly relevant to Sure's stated use-case. Under such an arrangement, the GT and associated signalling connectivity would remain under the control of the host mobile network operator and continue to be used by that operator to generate and receive the signalling messages required to support [✂]. Rather than interacting directly with signalling networks through a leased GT, the MVNO's OCS would communicate relevant charging instructions or charging information to the host operator through a controlled API interface. The host operator would then undertake the required signalling activity on the MVNO's behalf.

7.56. This approach enables the roaming and charging functionality to be retained without providing the MVNO with direct access to GTs or signalling connectivity.

7.57. In the GCRA's view, this is an important distinction. The arrangement would allow the MVNO to continue exercising control over its charging policies and commercial retail offering without obtaining direct access to signalling capabilities. The trust, transparency and accountability concerns associated with GT leasing would therefore be substantially reduced because signalling traffic would continue to originate from, and remain under the control of, the Licensed Operator responsible for operating the telecommunications network.

7.58. The GCRA understands from discussions with technical specialists that arrangements of this type are technically feasible and have been implemented in other jurisdictions. The Authority therefore considers the existence of such arrangements to be strong evidence that GT leasing is not necessary in order to support this particular use case.

7.59. The availability of those alternatives is an important consideration. The GCRA does not consider it appropriate to create a permanent exemption where reasonably practicable alternatives exist which achieve the underlying commercial objective whilst avoiding the risks associated with GT leasing.

7.60. The GCRA is also concerned that an MVNO exemption could undermine the effectiveness of the prohibition. Whilst the present request relates to a specific local MVNO arrangement, creating exemptions for particular categories of GT leasing increases the risk that access to GTs and signalling capabilities may

continue to be provided to third parties in circumstances which recreate the risks that the prohibition is intended to address. The Authority therefore considers that exemptions should remain limited and narrowly drafted unless there is compelling evidence that no practical alternative exists.

7.61. Nevertheless, the GCRA accepts that the existing arrangements between Sure and Coop Mobile cannot be replaced immediately and that implementation of an alternative solution will require technical development, testing and deployment. The Authority also considers it important that the introduction of the GT leasing prohibition does not create unnecessary disruption for existing customers or undermine competition in the local mobile market.

7.62. The GCRA therefore considers that the appropriate and proportionate response is not to create a permanent exemption, but instead to allow additional time for Sure and Coop Mobile to identify, develop and implement an alternative arrangement. The Authority further notes the advice received from technical specialists at Ofcom that a period of twelve months from publication of the Final Decision should be sufficient to implement an alternative solution, including an API-based charging arrangement if required.

7.63. In order to avoid undue disruption to existing customers and to provide sufficient time for alternative arrangements to be implemented, the GCRA will permit the existing arrangement between Sure and Coop Mobile to continue as a transitional arrangement until **1 December 2027**, after which it must cease.

Network Extensions

7.64. The GCRA additionally considered Sure's request for an exemption relating to network extension services.

7.65. As explained above, these network extension arrangements involve [✂] to provide services in specific locations around the world, ordinarily outside of the Channel Islands. During discussions with Case Officers, Sure explained that these arrangements often involve [✂].

7.66. The GCRA notes that neither Sure's response to the Proposed Decision, nor the representations made during the meeting of 29 September 2026, provided evidence demonstrating that GT leasing is necessary for these network extension arrangements. Sure's submissions focused principally on the fact that [✂]. However, neither point demonstrates that GT leasing is required to support the services in question or that the risks identified in this Final Decision would be adequately addressed through the proposed exemption.

7.67. The GCRA's starting position when considering requests for additional exemptions is that exemptions should remain limited and narrowly drafted. As explained above, the prohibition on GT leasing is intended to reduce the risks associated with third-party access to signalling capabilities. Additional exemptions necessarily reduce the effectiveness of that prohibition and create a risk that the harms identified throughout this Final Decision may continue to arise. The GCRA therefore considers that additional exemptions should only be granted where there is compelling evidence that they are necessary and that no reasonably practicable alternatives exist.

7.68. The GCRA is not satisfied that such evidence has been provided in this case.

7.69. First, the GCRA is concerned that a network extension exemption would create a relatively broad category of third-party GT users. Unlike other use cases which may involve a more limited range of signalling activity, network extension arrangements can involve the use of GTs to support core network functions across

multiple jurisdictions. As a result, such arrangements provide third parties with the ability to generate and receive a wide range of signalling traffic across multiple jurisdictions using resources associated with the Licensed Operator. In the GCRA's view, this would recreate many of the trust, transparency and accountability concerns which underpin the prohibition of GT leasing.

7.70. Secondly, the GCRA is also not satisfied that Sure has demonstrated that the risks associated with such arrangements can be adequately addressed through administrative, contractual or commercial controls. Whilst such arrangements may reduce the likelihood of misuse, they do not alter the fact that signalling capabilities have been made available to third parties. The GCRA similarly remains concerned that signalling traffic may be generated in a manner that is inconsistent with the intentions of the Licensed Operator or difficult for the Licensed Operator to effectively monitor and control.

7.71. The GCRA considers this concern to be particularly relevant in light of the evidence described in Section 5 of this Final Decision. As explained above, a number of the identified instances of suspicious or malicious signalling activity occurred despite the existence of administrative, contractual, operational or commercial controls intended to manage the risks associated with GT leasing. The GCRA is therefore not persuaded that reliance on such controls is sufficient to address the risks associated with a broad network extension exemption.

7.72. Furthermore, the GCRA notes that Sure has not demonstrated that network extension services cannot operate without GT leasing. In the GCRA's view, a number of alternative approaches are potentially available, including:

- **Hosted or "thin" MVNO arrangements**, under which signalling remains under the control of the host MNO and the MVNO interfaces with the host platform through APIs and other managed interfaces, rather than operating its own signalling infrastructure;

- The use of **roaming hubs**, which allow a provider to offer international roaming services without relying on another operator's GTs to extend roaming relationships. In practice, roaming hubs can enable access to a large number of international roaming partners without the need for extensive bilateral roaming arrangements;

- The allocation of **independent numbering resources and GTs**, where the operator maintains its own core network infrastructure and obtains its own numbering resources and signalling identifiers, rather than relying upon those of another operator; and

- **GT modification or translation approaches**, whereby signalling traffic continues to pass through infrastructure controlled by the GT holder and signalling addresses are modified before traffic is relayed onwards. Whilst the GCRA does not consider GT modification to be a preferred long-term solution, it may support certain roaming or multi-IMSI use cases whilst ensuring that signalling remains subject to the oversight of the GT holder.

7.73. Whilst such alternatives may require technical development, testing, investment or commercial restructuring, the GCRA has not been provided with evidence demonstrating that they are incapable of supporting the underlying use cases currently facilitated through network extension arrangements. The availability of such alternatives is an important consideration because the GCRA does not consider it appropriate to create a permanent exemption where reasonably practicable alternatives exist which can

support the same commercial objective whilst avoiding, or materially reducing, the risks associated with GT leasing.

7.74. The GCRA notes that similar considerations were examined by Ofcom[32], which concluded that broader MVNO-related exemptions were not justified where alternative arrangements existed and the proposed exemption would undermine the effectiveness of the prohibition. The GCRA considers that the same reasoning applies in the present case.

7.75. Taking these matters together, the GCRA is not satisfied that a network extension exemption is necessary or appropriate. The Authority remains concerned that such an exemption would create a significant category of third-party GT users and thereby undermine the effectiveness of the GT leasing prohibition by recreating many of the risks it is intended to address. The GCRA has also not been provided with compelling evidence that GT leasing is required to support these arrangements or that the associated risks can be adequately controlled.

7.76. The GCRA therefore declines Sure's request for a network extension exemption.

Penetration Testing

7.77. Finally, The GCRA also considered Sure's request for an exemption relating to penetration testing activities. Sure submitted that penetration testing represents a legitimate use case and argued that the associated risks could be managed through operational, contractual and technical controls.

7.78. The GCRA accepts that penetration testing represents a legitimate and valuable activity and recognises the importance of testing signalling security from both domestic and foreign signalling environments. However, the GCRA does not consider that a penetration testing exemption is appropriate or necessary.

7.79. The GCRA's primary concern is that such an exemption could create a route through which third parties obtain access to GTs and signalling connectivity under the guise of legitimate penetration testing. In the GCRA's view, this would create a material risk of abuse and could undermine the effectiveness of the wider GT leasing prohibition.

7.80. The GCRA also considers it relevant that penetration testing, by its nature, involves the generation of signalling traffic which is intended to replicate, simulate or test signalling behaviours that may otherwise be malicious or suspicious. Whilst such activity may be undertaken for entirely legitimate security purposes, it can be difficult to distinguish from malicious activity without detailed investigation and contextual information. The GCRA therefore considers that any exemption permitting third parties to obtain access to GTs and signalling connectivity for penetration testing purposes would present particular supervisory and enforcement challenges.

7.81. These concerns reinforce the Authority's view that a penetration testing exemption could create a route through which access to GTs and signalling capabilities is obtained under the guise of legitimate testing activity. The GCRA is not satisfied that contractual, administrative or operational controls would be sufficient to eliminate that risk. Whilst such controls may reduce the likelihood of misuse, they would not remove the need for Licensees and the GCRA to distinguish legitimate penetration testing traffic from genuinely malicious signalling activity.

[32] Statement: Global Titles and Mobile Network Security – see para 4.61 – 4.64 on pages 52 and 53

7.82. The GCRA also notes that alternative approaches appear to be available. These include direct connectivity arrangements between the testing organisation and the operator being tested, such as point-to-point or VPN-based connections, which enable testing to occur without requiring leased GTs or access to signalling networks through a GT leasing arrangement. The GCRA also understands that testing organisations may obtain their own numbering resources and associated GTs and undertake testing using those resources where appropriate.

7.83. The GCRA considers this position to be consistent with the evidence considered by Ofcom. In particular, P1 Security, a specialist provider of SS7 penetration testing services, informed Ofcom that it had never used leased GTs for penetration testing and did not consider any exemption necessary. P1 Security further stated that it considered the use of leased GTs for penetration testing to be insecure and high-risk.

7.84. Taking these matters together, the GCRA is not satisfied that a penetration testing exemption is necessary or appropriate. The GCRA remains concerned that such an exemption would create a potentially significant loophole in the GT leasing prohibition, whilst alternative approaches remain available.

Conclusion

7.85. The GCRA has carefully considered Sure's requests for additional exemptions to the GT leasing prohibition. For the reasons set out above, the Authority is not satisfied that the requested exemptions are necessary or appropriate.

7.86. In particular, the GCRA remains concerned that additional exemptions would undermine the effectiveness of the GT leasing prohibition and recreate many of the risks associated with third-party access to signalling capabilities. The Authority also notes that alternative approaches appear to be available for each of the use cases identified by Sure.

7.87. The GCRA therefore concludes that no additional permanent exemptions should be granted beyond those proposed in the Proposed Decision.

7.88. However, the GCRA recognises that the existing arrangement between Sure and Coop Mobile supports [✂] and that cessation could adversely affect those customers and competition in the local mobile market in the short run. The GCRA is satisfied that alternative solutions exist and therefore does not consider a permanent exemption necessary. Nevertheless, those alternatives will require time to implement and has therefore decided to permit the existing arrangement to continue as a transitional measure until **1 December 2027**, after which it must cease.

Additional Licence Conditions regarding High Risk Telecommunications Services

Proposed Decision

7.89. The GCRA's Proposed Decision proposed the introduction of additional licence conditions relating to telecommunications services capable of generating malicious signalling. These licence conditions were not intended to support compliance with the GT leasing prohibition itself. Rather, they were intended to address a separate but related risk arising from telecommunications services which utilise GTs and other signalling capabilities and which, if misused, may generate malicious signalling.

7.90. The Proposed Decision explained that the risks associated with malicious signalling are not limited to GT leasing arrangements. Telecommunications services capable of generating signalling traffic, such as GT modification or other translation approaches, may also create opportunities for misuse and give rise to risks and harms similar to those identified elsewhere in this Final Decision where appropriate due diligence, risk assessment, monitoring and controls are not in place. To address these risks, the Proposed Decision proposed that Licensed Operators providing such services should take reasonable and proportionate steps to identify, assess and mitigate the associated risks.

7.91. The Proposed Decision furthermore explained that "reasonable and proportionate steps" should include, as a minimum, appropriate and proportionate due diligence, risk assessment, contractual controls, technical controls, monitoring and reporting activities where Licensees provide telecommunications services capable of generating malicious signalling.

Responses to Proposed Decision

7.92. Sure objected to the proposed licence conditions. In particular, Sure submitted that the GCRA had not adequately explained why such conditions were required and argued that they were unnecessary in light of the proposed prohibition on GT leasing[33].

7.93. Sure also argued that the proposed licence conditions represented a departure from the approaches adopted by Ofcom and the Jersey Competition Regulatory Authority ("JCRA"), both of which had adopted guidance-based approaches. Sure considered that the GCRA's proposed approach was more prescriptive and less outcomes-focused than those adopted elsewhere.

7.94. Finally, Sure submitted that the proposed licence conditions could create a "box-ticking" approach to compliance and argued that a more outcomes-based framework would be preferable.

GCRA Assessment

7.95. The GCRA does not accept Sure's characterisation of the proposed licence conditions. In the GCRA's view, Sure appears to have misunderstood their purpose. As explained in the Proposed Decision, the conditions are not intended to support compliance with the GT leasing prohibition. Rather, they address a distinct but related risk associated with telecommunications services capable of generating malicious signalling.

7.96. The GCRA remains of the view that these conditions are necessary. Whilst GT leasing represents one route through which malicious signalling may be generated, it is not the only route. Telecommunications services capable of generating signalling traffic may, absent appropriate controls, result in malicious signalling activity and give rise to risks and harms similar to those identified elsewhere in this Final Decision. These include harms to consumers, risks to telecommunications networks, reduced trust between operators, and reputational damage to the Bailiwick. In the absence of the proposed licence conditions, there would be no specific regulatory obligation requiring Licensees to appropriately identify, assess and manage those risks.

7.97. The GCRA also does not accept that it has materially departed from the approaches adopted by Ofcom or the JCRA. Both regulators have published guidance relating to the misuse of GTs and associated signalling

[33] Sure response to GCRA's Global Title Leasing – Proposed Decision – 4 September 2026 – para 28 - 32

services which identifies the due diligence, risk assessment, monitoring, governance and oversight measures expected of operators.

7.98. The GCRA notes that Ofcom expressly states that its guidance is intended to assist providers in complying with their obligations under General Conditions B1.6 and B1.8. Similarly, the JCRA's interim guidance identifies the steps that operators are expected to take in order to address risks associated with GT misuse. In practical terms, both regulators therefore expect operators to undertake risk assessment, due diligence, monitoring and oversight activities in order to comply with their wider regulatory obligations.

7.99. The GCRA's proposed licence conditions place substantively similar obligations on Licensees. The language used, the behaviours expected and the outcomes sought are broadly equivalent to those set out in the Ofcom and JCRA guidance. In each case, operators are expected to undertake appropriate due diligence, understand how services are being used, assess associated risks, implement appropriate contractual and technical controls, monitor for misuse, and respond where misuse is identified.

7.100. The principal difference is one of regulatory mechanism rather than regulatory outcome. Whereas Ofcom and the JCRA articulate these expectations through guidance linked to existing regulatory obligations, the GCRA has chosen to incorporate substantially the same expectations directly into licence conditions.

7.101. The GCRA therefore does not accept that the proposed conditions are materially more prescriptive or less outcomes-focused than the approaches adopted by Ofcom and the JCRA. The proposed conditions do not mandate particular methodologies, technologies, contractual provisions or operational processes. Rather, they require Licensees to undertake appropriate and proportionate activities having regard to the risks presented by the services they provide.

7.102. Similarly, the GCRA does not accept that the proposed licence conditions create a greater risk of "box-ticking" compliance. A Licensee which undertakes superficial due diligence, risk assessment or monitoring would simply fail to comply with the outcomes required by the conditions. The GCRA therefore remains satisfied that the conditions are risk-based, outcomes-focused and proportionate.

7.103. Having considered the representations received, the GCRA remains satisfied that the proposed licence conditions address a distinct and important signalling-related risk which is separate from, albeit related to, the risks associated with GT leasing.

7.104. The GCRA therefore concludes that the proposed licence conditions relating to high-risk telecommunications services should be retained without substantive amendment.

Notification Obligations

7.105. The Proposed Decision provisionally concluded that, where a Licensee becomes aware that a Subscriber has generated, or is generating, malicious signalling, the Licensee should promptly notify the GCRA.

7.106. As explained in the Proposed Decision, the notification obligation formed part of the wider framework of licence conditions relating to high-risk telecommunications services. The GCRA considered that timely notification of malicious signalling activity would assist it in identifying emerging risks, understanding

patterns of misuse, coordinating with other authorities where appropriate, and taking regulatory action where necessary.

Responses to Proposed Decision

7.107. Sure expressed concern regarding the proposed notification obligation. In particular, Sure submitted that terms such as "prompt", "significant misuse" and "significant harm" were vague and that this created uncertainty regarding when notifications should be made and the timescales within which notifications were expected[34].

7.108. Sure argued that the absence of clear thresholds may result in over-reporting and require Licensed Operators to devote disproportionate resources to reporting and compliance activities.

GCRA Assessment

7.109. The GCRA has carefully considered Sure's representations regarding the proposed notification obligation.

7.110. The GCRA accepts that the absence of prescribed definitions for terms such as "prompt", "significant misuse" and "significant harm" may create an initial degree of uncertainty and require Licensees to exercise greater judgement when determining whether a notification should be made.

7.111. The GCRA also accepts that this approach may require Licensees to invest additional time and resources in developing internal policies, procedures and escalation frameworks capable of identifying malicious signalling activity, assessing its significance and determining when regulatory notification is appropriate.

7.112. However, the GCRA remains of the view that a principles-based and risk-based framework is preferable to a more prescriptive approach. The proposed licence conditions apply to a broad range of telecommunications services capable of generating signalling traffic. Those services may differ significantly in their technical design, intended use, customer base, and associated risk profile. Similarly, the risks associated with individual customers, signalling arrangements and use cases may vary considerably between Licensed Operators and over time.

7.113. In the GCRA's view, it would not be appropriate to prescribe a single set of notification thresholds, definitions or reporting requirements for such a diverse set of products and services. A highly prescriptive framework risks being insufficiently responsive to higher-risk services whilst simultaneously imposing unnecessary compliance burdens on lower-risk services.

7.114. The GCRA also considers that Licensed Operators are generally best placed to understand the services they provide, the customers they serve, and the risks presented by particular products and signalling arrangements. The GCRA therefore expects Licensees to assess those risks and implement notification processes which are proportionate and appropriate to the level of risk presented. In the Authority's view, this approach is more likely to result in effective risk management and meaningful regulatory notifications than a one-size-fits-all framework based on prescriptive definitions and thresholds.

7.115. The GCRA is also concerned that prescriptive definitions of terms such as "significant misuse", "significant harm" or "prompt" could give rise to unintended consequences. In particular, there is a risk that Licensees focus on whether an incident falls within a defined threshold rather than whether it presents a material

[34] Sure response to GCRA's Global Title Leasing – Proposed Decision – 4 September 2026 – para 33 - 38

risk requiring notification. This may result in novel, unforeseen or evolving forms of malicious signalling activity not being reported where notification would otherwise be appropriate.

7.116. Similarly, the GCRA considers that prescribed notification timescales may not be suitable in all circumstances. Certain incidents may justify immediate engagement with the GCRA, whilst others may require additional investigation before a meaningful notification can be provided. The GCRA therefore considers that a degree of flexibility is necessary to ensure that notifications remain proportionate to the risks presented by individual incidents.

7.117. The GCRA expects Licensees to adopt a mature and risk-based approach to compliance. This includes implementing appropriate policies, procedures and escalation processes which reflect the risks associated with the services they provide, and which enable the Licensee to identify malicious signalling activity, assess its significance and determine when notification to the GCRA is required.

7.118. Furthermore, the GCRA would generally expect Licensees to have regard to the nature, scale and potential consequences of the activity concerned. For example, signalling activity which gives rise to a material risk of harm to consumers, telecommunications networks, other operators or the reputation of the Bailiwick is more likely to warrant notification than isolated incidents presenting limited risk. Similarly, the GCRA would ordinarily expect notifications to be made without undue delay once the Licensee has obtained sufficient information to understand the nature of the issue and its potential significance.

7.119. By way of illustration only, the GCRA would generally expect incidents involving suspected subscriber location tracking, call interception, widespread signalling misuse, or significant consumer harm to be treated as 'significant harm' and notified significantly more quickly than lower-risk incidents. The appropriate timing of any notification will ultimately depend on the circumstances of the particular case, but the GCRA would ordinarily expect such incidents to be reported as soon as reasonably practicable and generally within 48 hours.

Conclusion

7.120. The GCRA acknowledges that a principles-based framework requires Licensees to exercise greater judgement than a prescriptive rules-based approach. However, the Authority remains satisfied that this approach is more likely to deliver effective regulatory outcomes and ensure that notification arrangements remain responsive to the specific risks presented by individual services, customers and incidents.

7.121. The GCRA therefore concludes that the proposed notification obligation should be retained without substantive amendment.

Implementation Period

7.122. In this section, the GCRA considers whether it is necessary and appropriate to allow an implementation period for its decision to prohibit GT leasing in order to help mitigate any transitional adverse impacts.

Proposed Decision

7.123. The Proposed Decision recognised that implementation of a prohibition on GT leasing would require affected Licensed Operators to review existing arrangements, identify alternative solutions, and make any necessary contractual, operational and technical changes.

7.124. However, the GCRA also considered that GT leasing gives rise to significant risks and harms which require timely intervention. The GCRA therefore sought to balance the need to address those risks against the practical requirements associated with implementation.

7.125. In reaching its provisional view, the GCRA also took account of the policy position communicated by the Committee for Home Affairs and the Committee for Economic Development, namely that GT leasing and sub-leasing should cease in the Bailiwick from 1 May 2027.

7.126. Taking these considerations into account, the Proposed Decision provisionally concluded that the prohibition on GT leasing, and the associated licence modifications, should take effect on **1 May 2027**. The GCRA considered that this implementation period would provide Licensed Operators with an opportunity to identify and implement alternative arrangements whilst ensuring that the risks associated with GT leasing were addressed without unnecessary delay.

Responses to Proposed Decision

7.127. The GCRA received on response on this matter from Sure.

7.128. Sure submitted that the proposed implementation date of 1 May 2027 was too early and should be extended[35].

7.129. Sure explained that a substantial amount of work would be required to transition away from GT leasing arrangements and that these activities would need to be undertaken alongside other significant projects, including mobile network modernisation and full fibre deployment. Sure also noted that [✂].

7.130. Sure further submitted that GT modification, which it identified as a potential alternative to GT leasing for some use cases, would require extensive testing before it could be deployed with confidence. According to Sure, this testing had [✂].

7.131. Sure also argued that it should not have been expected to undertake significant implementation activity prior to publication of a Final Decision. In particular, Sure submitted that operators require regulatory certainty before investing significant time and resources in the development of alternative commercial and technical solutions.

7.132. Finally, Sure noted that both Ofcom and the Jersey Competition Regulatory Authority had provided longer implementation periods (12 – 14 months) as part of their respective GT leasing prohibitions. Sure argued

[35] Sure response to GCRA's Global Title Leasing – Proposed Decision – 4 September 2026 – para 9 - 15

that a longer implementation period would better facilitate an orderly transition to alternative arrangements and reduce the risks associated with implementation.

GCRA Assessment

7.133. The GCRA has carefully considered Sure's representations regarding the proposed implementation date.

7.134. The GCRA accepts that compliance with the GT leasing prohibition will require [✂], including engagement with customers, identification of alternative arrangements, modification of existing services and implementation of replacement solutions. The GCRA also accepts that these activities will need to be undertaken alongside other significant projects being delivered by Licensed Operators.

7.135. However, the starting point for the GCRA's assessment is the significant risks and harms associated with GT leasing identified throughout this Final Decision. As explained in Sections 4 and 5, those risks include harm to consumers, risks to telecommunications networks, reduced trust and transparency within signalling networks, and reputational damage to both Licensed Operators and the Bailiwick. The GCRA also notes that Sure did not challenge the underlying evidence of harm relied upon by the GCRA. In the absence of proportionality considerations, immediate prohibition would be the most effective means of addressing those risk.

7.136. The GCRA therefore considers that the implementation period is itself a proportionality measure intended to balance the need for timely intervention against the practical requirements associated with compliance.

7.137. The GCRA has also had regard to the policy position communicated by the States of Guernsey. As explained in Section 6 of this Final Decision, the Committee for Home Affairs and the Committee for Economic Development stated their expectation that GT leasing and sub-leasing should cease from 1 May 2027. Following receipt of Sure's response, the GCRA sought clarification regarding whether there was any flexibility in that position. The States subsequently confirmed that the position remained unchanged. Whilst the GCRA has reached its own independent conclusions, it considers the States' policy position to be an important consideration in its assessment of the appropriate implementation date.

7.138. The GCRA recognises that certain implementation decisions may reasonably have awaited publication of a Final Decision. However, the GCRA does not accept that publication of a Final Decision was necessarily a prerequisite to all planning, assessment or contingency activities.

7.139. Prior to publication of the Proposed Decision, the GCRA had consulted publicly on GT leasing in January 2025, Ofcom had progressed and completed its own GT leasing work, the JCRA had taken corresponding action, and the States of Guernsey had communicated a clear policy position regarding the cessation of GT leasing to Sure earlier in 2026. The GCRA therefore considers that Licensees had sufficient visibility of potential regulatory change to assess the implications of a GT leasing prohibition and explore potential alternative arrangements.

7.140. The GCRA also notes that Sure had visibility for some time that restrictions on GT leasing were being considered and implemented across the wider Channel Islands and UK regulatory landscape. In particular, following its acquisition of Jersey Airtel Limited in 2024, Sure became subject to the equivalent GT leasing prohibition introduced by the JCRA, which is also due to take effect on 1 May 2027. The GCRA therefore considers that Sure had an opportunity to consider the implications of GT leasing prohibitions across both

jurisdictions and to assess potential alternative arrangements capable of supporting compliance with those requirements.

7.141. The GCRA accepts that Licensees may reasonably have wished to await greater regulatory certainty before committing to particular implementation solutions. However, the GCRA does not consider that publication of a Final Decision was necessarily a prerequisite to assessing alternative arrangements, understanding implementation challenges, or undertaking contingency planning.

7.142. Nor does the GCRA consider that implementation concerns associated with a particular transition strategy necessarily demonstrate that the proposed implementation date is disproportionate, particularly where alternative compliance options may be available. The GCRA notes that a significant proportion of Sure's implementation concerns relate to the complexity and testing requirements associated with GT Modification. The GCRA accepts that GT modification may require substantial technical assessment and testing before it can be deployed with confidence.

7.143. However, the GCRA is not requiring Licensees to adopt GT modification as an alternative to GT leasing. A range of alternative arrangements may be capable of supporting use cases currently facilitated through GT leasing. Depending on the relevant use case, these may include:

- API-based solutions;
- hosted or thin MVNO arrangements;
- roaming hubs;
- Encouraging lessees to obtain their own numbering resources and GTs;
- direct connectivity arrangements;
- GT modification or translation approaches; and
- other commercial or technical arrangements which do not require GT leasing.

7.144. The GCRA therefore does not consider it appropriate to assess the reasonableness of the implementation period solely by reference to the requirements of GT modification, or any other individual solution preferred by a Licensee. The relevant question is whether Licensees have sufficient time to comply with the prohibition on GT leasing, taking into account the range of alternative approaches potentially available to them. The GCRA considers that the 1 May 2027 implementation deadline does provide that sufficient time.

7.145. Finally, the GCRA has considered the implementation periods adopted by Ofcom and the JCRA. The GCRA accepts that these decisions are relevant and informative. However, they are not determinative of the appropriate outcome in Guernsey. The GCRA must reach its own conclusion having regard to the specific circumstances of the Bailiwick, the evidence before it, its statutory duties, the States of Guernsey's policy position and the risks associated with GT leasing.

7.146. In particular, the GCRA notes that the evidence considered in this Final Decision includes instances of misuse associated with telecommunications resources allocated for use within the Bailiwick of Guernsey. The GCRA therefore considers that the risks associated with GT leasing are not merely theoretical or indirect, but are capable of affecting consumers, telecommunications operators and the reputation of the Bailiwick itself. The Authority also considers that continued misuse, or the perception that Guernsey-associated telecommunications resources are being misused, could adversely affect confidence in the Bailiwick's telecommunications sector and have wider implications for the Bailiwick's economic interests.

7.147. The GCRA therefore considers that it must determine the appropriate implementation period by balancing the practical challenges associated with compliance against the need to address the specific risks identified in this Final Decision. Whilst the implementation periods adopted elsewhere provide a useful reference point, the GCRA does not consider that they should outweigh the evidence of harm, the risks to the Bailiwick, or the States of Guernsey's policy position that GT leasing should cease from 1 May 2027.

Conclusion

7.148. The GCRA accepts that implementation of the GT leasing prohibition will require significant commercial, contractual and technical effort. However, extending the implementation period would also prolong the risks identified throughout this Final Decision.

7.149. Taking into account the harms associated with GT leasing, the implementation period already provided, the availability of alternative arrangements, the States of Guernsey's policy position and the GCRA's statutory duties, the GCRA remains satisfied that **1 May 2027** represents an appropriate and proportionate implementation date for the prohibition on GT leasing.

7.150. However, the GCRA recognises that the existing arrangement between Sure and Coop Mobile presents distinct considerations. The GCRA has concluded that alternative arrangements exist and that a permanent exemption is neither necessary nor appropriate. Nevertheless, the GCRA accepts that the existing arrangement supports [✂] and that immediate cessation could adversely affect those customers and competition within the Bailiwick's mobile market. The GCRA further accepts that additional time is required to identify, develop, test and implement a replacement solution. **The GCRA therefore considers it appropriate to permit that specific arrangement to continue on a transitional basis until 1 December 2027.**

7.151. The GCRA therefore concludes that the prohibition on GT leasing shall take effect on **1 May 2027**. However, as a transitional measure, the existing arrangement between Sure and Coop Mobile, [✂], **may continue until 1 December 2027**, after which it must cease.

8. MODIFICATION DECISION AND NEXT STEPS

8.1. The GCRA hereby:

a) gives notice to 5th Dimension (Guernsey) Ltd, Base Limited ta/ Genesis AV, BT Jersey Ltd (Guernsey), Business Telecom Limited, Flo Connect Ltd, Gamma Telecom Holdings Ltd (Guernsey), Guernsey Airtel Limited, JT (Guernsey) Ltd, Logicalis Guernsey Ltd, GuernseyTel Limited, Offshore Leisure Limited t/a Coop Mobile, Richard Bird t/a Links Communications, Starlink Internet Services Limited, Sure (Guernsey) Limited, TP Global Operations Limited t/a 1GLOBAL of its proposed decision to modify their telecommunications licence(s) as set out in Annex A to this Final Decision; and

b) gives notice to the public of the above licence modification.

8.2. The licence modification decision has been notified to holders of those licences to which the modifications related. It has also been published on the GCRA website and in La Gazette Officielle.

8.3. The licence modifications shall be implemented by 30 November 2026, and take effect on 1 May 2027 unless stated otherwise by the GCRA.

ANNEX A

Amendments

1. The GCRA proposes to amend Licence Condition 1 ("Definitions and Interpretation") in each Telecommunications Licence by inserting the following definitions:

   "C7": means the standard for common channel signalling in Licensed Mobile Telecommunications Networks (also known as 'SS7');

   "Global Title": means a number created from any Numbers as may be used and identified for use as a signalling address in the Licensed Mobile Telecommunications Network, for the part of C7 known as 'Signalling Connection Control Part';

   "Holding Company": means a holding company as defined in section 531 of the Companies (Guernsey) Law, 2008;

   "Signalling Connection Control Part": means the signalling protocol of that name that is part of the SS7 common channel signalling standard as defined in ITU-T Recommendations Q.711 to Q.719;

   "Subsidiary": means a subsidiary as defined in section 531 of the Companies (Guernsey) Law, 2008;

   "Wholly-Owned Subsidiary": means a wholly-owned subsidiary as defined in section 531 of the Companies (Guernsey) Law, 2008;

2. The GCRA proposes to insert new Licence Conditions at the end of Part VI (Numbering) of each mobile telecommunications licence as follows:

   [X.14] Only the Licensee shall create and use a Global Title from Numbers Allocated to it by Ofcom.

   [X.15] The Licensee shall not authorise any person to use Numbers allocated to it by Ofcom as a Global Title unless the person being authorised is:

   (a) a Subsidiary, Wholly-Owned Subsidiary, or Holding Company of the Licensee; or

   (b) a person supplying services to the Licensee and uses the Numbers provided as a Global Title exclusively to provide services to the Licensee.

   [X.16] Where the Licensee Adopts Numbers under [X.3(b)], the Licensee shall not use those Numbers as Global Titles.

   [X.17] Where the Licensee provides a Licensed Telecommunications Service which is capable of generating malicious signalling, the Licensee shall take all reasonable steps to prevent the generation of malicious signalling.

   [X.18] For the purposes of [X.17], "reasonable steps" shall include as a minimum:

[X.18.1] undertaking appropriate and proportionate 'know your customer' (KYC) checks prior to, and during, the provision of the Licensed Telecommunications Service;

[X.18.2] undertaking an appropriate and proportionate periodic risk assessment which includes the risks associated with the provision of the Licensed Telecommunications Service and the risks which could arise from the Subscriber's use of the Licensed Telecommunications Service;

[X.18.3] documenting the steps taken to identify, understand, and mitigate the risks identified in [X.18.2].

[X.18.4] putting in place appropriate contractual controls which oblige the Subscriber not to generate malicious signalling.

[X.18.5] putting in place appropriate and proportionate technical controls which prevent the generation of malicious signalling from the Licensed Telecommunications Service.

[X.18.6] having and complying with a written procedure for the effective consideration and fair, proper, and timely handling of complaints or information about malicious signalling.

[X.19] Where the Licensee becomes aware that a Subscriber has generated, or is generating, malicious signalling, the Licensee shall promptly notify the GCRA.

[X.20] The Licensee shall comply with all guidance issued by the GCRA regarding [X.17] and [X.18].