GLOBAL TITLE LEASING

T1655G

PROPOSED DECISION

NON-CONFIDENTIAL

Date: 17/07/2026

Guernsey Competition & Regulatory Authority
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Contents

1. SUMMARY

1.1 This Proposed Decision concerns the leasing of Global Titles ("**GTs**") by Licensed Operators in Guernsey. GTs support legitimate mobile network functions, but where they are leased to third parties, they can create security, transparency and reputational risks, including risks of location tracking, interception, information retrieval, fraud and other telecommunications-enabled offending.

1.2 Having considered the risks associated with GT leasing, evidence of international and Guernsey-specific misuse, and the policy position communicated by the States of Guernsey, the GCRA proposes to prohibit Licensed Operators from leasing GTs to third parties in the Bailiwick, except in very limited circumstances.

1.3 The GCRA also proposes to prevent GTs being created or used from sub-allocated Guernsey number ranges, and to introduce additional obligations to prevent misuse where Licensees provide other services capable of generating malicious signalling.

1.4 These measures would be introduced through new licence conditions, as described in Annex A. The GCRA considers that this is a necessary, appropriate and proportionate response to the risks identified in this Proposed Decision, and that it is preferable to permitting GT leasing to continue under a rules-based framework.

1.5 Subject to the outcome of this consultation process, the proposed licence modifications would take effect on 1 May 2027.

1.6 The GCRA invites written representations or objections on the proposed licence modifications by **5pm on Friday 28 August 2026**.

2. STRUCTURE OF THIS DOCUMENT

2.1 This document is structured as follows:

Section 3	Sets out the legal framework for the proposed licence modifications.
Section 4	Explains GTs, GT leasing and the risks associated with SS7 signalling.
Section 5	Summarises evidence of international and Guernsey-specific misuse.
Section 6	Summarises the position communicated by the States of Guernsey.
Section 7	Sets out the GCRA's proposals and why the GCRA considers them necessary, appropriate and proportionate.
Section 8	Sets out the proposed licence modification decision and next steps.
Annex A	Sets out the proposed modifications to telecommunications licences.

3. Legal Framework

3.1 Section 8(1) of the Telecommunications (Bailiwick of Guernsey) Law, 2001 (“**Telecoms 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).*”

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.”

3.3 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

(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. BACKGROUND

Global Titles

4.1. 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 between network nodes, and are not assigned to end-users.

4.2. 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.

4.3. 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.

4.4. GTs are therefore essential to the exchange of SS7 signalling messages in 2G and 3G mobile networks. They support 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.

4.5. These functions are legitimate and necessary. However, the same signalling environment can also be misused where access is obtained by parties that are not appropriately controlled, monitored or trusted. The specific risks associated with GT leasing are considered further below.

4.6. SS7 is a legacy signalling system which was developed in the 1970s and standardised in the 1980s. It was designed for an international telecommunications environment in which access to signalling networks was limited and mobile network operators were treated as known and trusted participants. The consequence of that design is that SS7 was not built with the same authentication, access control and verification features that would be expected in a modern open digital environment.

Global Title Leasing

4.7. 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".

4.8. 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.

4.9. 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.

4.10. 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.

4.11. 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.

4.12. 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.

4.13. 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.

4.14. However, there are also significant risks associated with the leasing of GTs to third parties. Without appropriate controls, GT leasing enables third parties to obtain access to global mobile signalling networks. Those third parties may not themselves be mobile network operators. They may also not be licensed, known to receiving networks, or subject to the same level of regulatory oversight as a Licensed Operator.

4.15. 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.

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

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

4.18. 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.

4.19. 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.

4.20. 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.

4.21. 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.

4.22. 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.

4.23. 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.

4.24. There is also a specific risk arising from Guernsey's reliance on +44 numbering resources. Guernsey's mobile operators operate within the +44 country code environment and depend on continued access to those numbering ranges from Ofcom. Misuse, or perceived misuse, of GTs associated with Guernsey could undermine confidence in the integrity of the wider +44 numbering space. This, in turn, could give rise to regulatory or operational concerns, including the potential for restrictions on access to numbering facilities by Guernsey operators. In an extreme case, Guernsey could face limitations on its ability to obtain or retain access to +44 numbering resources, which would have significant operational consequences for Licensed Operators and customers in the Bailiwick.

Ofcom's Global Titles and Mobile Network Security Statement

4.25. The GCRA notes that 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[1].

[1] Global Titles and Mobile Network Security

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[2].

4.26. 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.

4.27. 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.

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

4.28.1. 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[3]. 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.

4.28.2. 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.

4.28.3. 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.

4.29. 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

4.30. In January 2025, the GCRA issued a consultation entitled "Proposals to Ban the Leasing of Global Titles from +44 numbers in Guernsey"[4]. The consultation explained the GCRA's concern that malicious use of GTs

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[2] Statement: Global Titles and Mobile Network Security

[3] 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.

[4] Case T1655G - Proposals to Ban the Leasing of Global Titles from +44 numbers in Guernsey - Consultation

created using Guernsey +44 numbers could create serious risks for telecommunications customers, telecommunications networks, and Guernsey's jurisdictional reputation.

4.31. 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.

4.32. 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.

4.33. 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.

4.34. The GCRA received responses from Sure (Guernsey) Limited ("Sure") and JT (Guernsey) Limited ("JT")[5][6]. The GCRA has considered those responses in developing this Proposed 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.

4.35. 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.

4.36. 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.

4.37. 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

[5] 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]

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

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 [✂].

4.38. Having considered the consultation responses and the further material now available to it, the GCRA remains concerned that GT leasing creates risks which are not adequately addressed by existing controls. The GCRA also considers that the regulatory position has developed since the January 2025 consultation, including through Ofcom's final decision and the position communicated to the GCRA by the States of Guernsey.

4.39. This Proposed Decision therefore builds on the January 2025 consultation. It explains the evidence and reasoning which have led the GCRA to propose licence modifications prohibiting GT leasing, prohibiting the creation of GTs from sub-allocated numbers, and requiring Licensed Operators to take reasonable, risk-based steps where they provide services which use GTs as an input and which have the potential to generate malicious signalling.

5. Misuse of Global Titles

5.1 The previous section explains the risks associated with GT leasing. This section considers evidence that those risks are not theoretical and that GTs have been misused, or associated with misuse, both internationally and in ways that are relevant to the Bailiwick of Guernsey.

International Evidence of Misuse

5.2 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.

5.3 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.

5.4 In May 2023, Lighthouse Reports published an investigation into [✂][7]. 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.

5.5 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[8]. 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

[7] Ghost in the network - Lighthouse Reports
[8] Australia-Owned Pacific Telco Likely Exploited by Private Spies | OCCRP

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.

5.6 In October 2025, Lighthouse Reports published an investigation into [✂], an Indonesian phone-tracking company, and its [✂] surveillance tool[9]. 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.

5.7 The GCRA considers that these examples are relevant because they corroborate the theoretical 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.

5.8 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.

5.9 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 arises primarily from 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.

5.10 That information also substantiates much of the open-source reporting referred to above. In particular, it indicates that threat actors such as [✂], [✂]and [✂] appear to have 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.

5.11 The GCRA recognises that not every instance of signalling misuse necessarily arises from GT leasing. Signalling misuse may occur through a variety of means and may involve actors with direct access to signalling networks or other forms of infrastructure. However, the open-source and confidential material considered by the GCRA indicates that commercial GT leasing arrangements have been a significant and recurring means by which third parties have obtained access to mobile signalling networks and engaged in suspicious or malicious activity. Taken together, that 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.

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

Guernsey Evidence of Misuse

5.12 The GCRA also considers that the risks associated with GT leasing have materialised in a way that is directly relevant to Guernsey and the Channel Islands. In particular, public reporting, security research, expert evidence provided to the GCRA, and information from UK authorities have associated Guernsey and Channel Islands GTs, or related signalling infrastructure, with misuse or suspected misuse.

5.13 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[10]. 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.

5.14 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 [✂] and networks in other jurisdictions.

5.15 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 [✂] into networks in North America, Europe and Africa in August 2020.

5.16 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 [✂][11]. The reporting stated that the signalling messages could have been used to pinpoint the person's location or intercept communications.

5.17 In April 2026, Citizen Lab published research concerning covert surveillance activity using mobile operator signalling infrastructure[12]. Citizen Lab identified [✂] as relevant Channel Islands infrastructure and stated that [✂] had been seen as the first hop for Diameter signalling surveillance queries, with further surveillance dating back to the 2022 timeframe.

5.18 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.

5.19 In October 2024, the GCRA engaged with Enea[13], 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[14].

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[10] Spy companies using Channel Islands to track phones around the… | TBIJ
[11] Israeli spy firm suspected of accessing global telecoms via Channel Islands | Espionage | The Guardian
[12] Bad Connection: Uncovering Global Telecom Exploitation by Covert Surveillance Actors - The Citizen Lab
[13] AI-Powered Software for Telecom Networks & Cybersecurity
[14] The GCRA obtained Enea's Signalling Intelligence Layer reports to evidence the risks and harms associated with leasing Global Titles from +44 number ranges.

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

5.21 The report is relevant to Guernsey because Enea identified [✂], together with [✂], as part of a set of SS7 GTs re-attributed to GWSIM's control. Enea also identified the [✂] GT as one of the malicious sources previously most commonly linked to a Digicel Fiji 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.

5.22 The GCRA has also 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.

5.23 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.

5.24 The GCRA considers this information to be significant because it indicates that concerns about Guernsey-linked GTs are not limited to historic public reporting or earlier expert analysis. Rather, Ofcom's recent engagement has identified potential current instances of suspicious signalling associated with Guernsey-allocated GTs.

5.25 These potential instances of misuse occurred in 2026. They show that concerns about Guernsey-linked GTs are not limited to historic public reporting or earlier Enea analysis, but reflect a present and persistent risk of suspicious signalling associated with Guernsey-allocated GTs.

5.26 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"[15] in its consultation and statement documents[16].

5.27 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.

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

5.29 Taken together, this evidence supports the GCRA's view that Channel Islands GTs, including GTs associated with Guernsey, appear to have been a source of high-risk and malicious signalling. It also reinforces the

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

GCRA's concern that GT leasing can expose Guernsey and the wider Channel Islands to significant reputational and operational risk.

6. LETTER FROM 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 for Home Affairs 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 current 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 ringfenced around the harmful activity identified, while recognising that there may be legitimate services which use location or signalling-related inputs and that alternatives may be available which do not rely on GT leasing or SS7 signalling access.

6.5. The GCRA has had regard to the position of the States of Guernsey in developing this Proposed Decision. The GCRA considers the letter to be an important policy and public-interest input, 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.

6.6. However, the GCRA has not treated the letter as determinative of its decision. The GCRA must reach its own view in accordance with its statutory duties, the Telecommunications Law, the Regulation Law, any applicable States' Directions, the principles of economic regulation, and the evidence available to it.

7. PROPOSAL

7.1. Having considered the matters set out in sections 4 to 6, the GCRA considers that new licence conditions are required to address the risks associated with GT leasing in the Bailiwick. In particular, the GCRA has taken into account the inherent risks posed by SS7 signalling and GT leasing, the evidence of international and Guernsey-specific misuse, Ofcom's position regarding +44 GTs, and the position communicated by the States of Guernsey.

7.2. The GCRA therefore proposes to introduce licence conditions which would:

7.2.1. prohibit Licensed Operators from leasing GTs to third parties, except in limited circumstances;

7.2.2. prevent Licensed Operators from creating GTs from number ranges sub-allocated under condition [X.3] of Part VI; and

7.2.3. introduce targeted obligations to prevent misuse of GTs by Licensees and their customers.

7.3. It is proposed that these new licence conditions will take effect from 1 May 2027, in accordance with the position communicated by the States of Guernsey.

7.4. This section explains why the GCRA considers these measures to be necessary, appropriate and proportionate.

Why prohibition is necessary in the Bailiwick

7.5. The GCRA has considered whether the risks associated with GT leasing could be addressed through a rules-based framework rather than a prohibition. In response to the GCRA's 2025 consultation, Sure did not support an outright prohibition and proposed a control framework based on measures such as codifying the GSMA Global Title Leasing Code of Conduct, enhanced due diligence, contractual controls, monitoring, information-sharing, route-via-lessor requirements and signalling firewall measures[17]. JT also referred to codification of the GSMA Code of Conduct and the use of clear guidance as part of a strengthened regulatory framework[18].

7.6. The GCRA accepts that such controls may reduce some risks. However, the GCRA does not consider that a rules-based framework would adequately address the risks arising from GT leasing to third parties.

7.7. Firstly, the States' position is an important consideration. The GCRA has taken that position into account alongside the evidence available to it, the consultation responses received, and its statutory duties. The GCRA is an independent statutory regulator and must reach its own view in accordance with its duties, functions and powers. However, where the States of Guernsey has expressed a clear policy position on matters affecting the public interest, the GCRA considers it appropriate to take that position into account as part of its overall assessment.

7.8. The States' position is unambiguous. Given the security implications of GT leasing and its potential misuse to facilitate serious criminal activity, fraud and telecommunications-enabled offending, the States' position is that GT leasing and sub-leasing should cease in the Bailiwick by 1 May 2027. The GCRA considers that position to be relevant to its assessment, particularly in light of its statutory objective to ensure that utility activities are carried out in a way that best serves and contributes to the economic and social development and well-being of the Bailiwick[19].

[17] Proposal to Ban the Leasing of Global Titles From +44 Numbers in Guernsey – Sure (Guernsey) Limited Response – page 16, response to Question 5.
[18] JT's response to Ofcom's Global Titles and Mobile Security Consultation – page 2, response to Question 1.
[19] Regulation of Utilities (Bailiwick of Guernsey) Law, 2001 – s2(c)

7.9. The GCRA has not treated the States' position as determinative of the outcome of this assessment. Rather, the GCRA has considered that position alongside the available evidence, consultation responses, and the range of regulatory options available to it. Having undertaken that assessment, the GCRA has concluded that a prohibition on GT leasing to third parties is the most appropriate means of addressing the identified risks and best discharges its statutory duties.

7.10. Secondly, the GCRA considers that a rules-based framework would not resolve the core trust and transparency concerns created by GT leasing. GT leasing enables a third party to use signalling access associated with a Licensed Operator. Recipient networks may therefore be unable to distinguish between signalling generated by a Guernsey Licensed Operator for its own legitimate network purposes and signalling generated by a third-party lessee using GTs associated with that Licensed Operator.

7.11. That lack of transparency is central to the risk. It may allow malicious or suspicious activity to appear to originate from a trusted operator or jurisdiction, while obscuring the identity, purpose and conduct of the underlying third party. Given the evidence of historic and recent misuse associated with Guernsey and the wider Channel Islands, the GCRA considers that permitting GT leasing to continue, even subject to additional rules, would be unlikely to restore confidence in Guernsey-associated signalling traffic or in Guernsey's use of +44 numbering resources.

7.12. The GCRA also considers that a rules-based framework would be unlikely to prevent all harmful use. Even with enhanced due diligence, a Licensed Operator may not be able to identify all threat actors or detect all illegitimate purposes before access is granted. The effectiveness of any due diligence process would depend heavily on the information available to the Licensed Operator at the time of assessment, which may be incomplete.

7.13. There is also a risk that a party which appears legitimate may sub-lease, onward-provide or otherwise make access available to another party. That risk is particularly important because GT leasing arrangements may involve parties outside Guernsey and outside the GCRA's direct regulatory oversight. In those circumstances, contractual controls and reporting obligations may assist, but they would not remove the risk that access could ultimately be used by parties which the Licensed Operator has not assessed and cannot effectively control.

7.14. Thirdly, inherent vulnerabilities in the SS7 protocol limit the effectiveness of a rules-based approach. Legitimate and illegitimate activity may be carried out using the same network signalling messages. As a result, ongoing monitoring may not reliably distinguish between lawful use and misuse in real time, particularly where the signalling message is technically valid and capable of serving a legitimate network function.

7.15. For example, an SRI-SM message is an essential part of the process for delivering SMS traffic in SS7. However, the same type of message can also be used to obtain information about a subscriber's IMSI and approximate location, which may then be used to target that subscriber. This is consistent with the evidence provided to the GCRA by Ofcom and other third parties, which indicates that suspected misuse is often carried out using signalling messages that are also legitimate and necessary for other network functions. The corollary is that misuse may not be identified until after the malicious activity has occurred and potential harm to end-users has already been caused. In the GCRA's view, this supports the conclusion that monitoring, due diligence and other controls would not adequately prevent misuse while GT leasing to third parties remains permitted.

7.16. The GCRA's position is consistent with Ofcom's approach to +44 GTs. The prohibition is necessary to address the risks inherent in GT leasing to third parties, while the additional proposed licence conditions are necessary to prevent misuse by Licensees and their customers in relation to other GT-related services.

7.17. For these reasons, the GCRA considers that codifying the GSMA Code of Conduct or introducing a wider rules-based framework would not be an adequate substitute for prohibition. The GCRA therefore considers that a prohibition on GT leasing to third parties is necessary.

Why prohibition is appropriate and proportionate in the Bailiwick

7.18. The GCRA has considered whether a prohibition on GT leasing to third parties would be appropriate and proportionate, having regard to the benefits of the proposed prohibition and the potential adverse impacts on Licensed Operators, their customers and end-users.

7.19. As already explained in this Proposed Decision, the GCRA considers that the prohibition would deliver significant benefits. It would materially reduce the risk of Guernsey-associated GTs being used to generate malicious or suspicious signalling, and would therefore reduce the risk of harm to end-users, including location tracking, interception, information retrieval, fraud and other telecommunications-enabled offending. It would also reduce the reputational and operational risks to Guernsey Licensed Operators, support confidence in Guernsey's use of +44 numbering resources, and protect the reputation of the Bailiwick as a well-regulated jurisdiction.

7.20. Whilst difficult to quantify in monetary terms, these benefits are, in the GCRA's view, substantial.

7.21. The GCRA has then considered the potential costs of prohibition. The principal cost identified in response to the GCRA's 2025 consultation was the revenue impact on Sure. Sure 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.

7.22. The GCRA places greater weight on current and reasonably certain revenue than on projected future revenue. Future revenue is inherently uncertain and depends on assumptions about future market demand, customer behaviour and the continuation of an activity which the States of Guernsey has said should cease. The GCRA therefore considers Sure's current estimated GT leasing revenue of approximately £[✂] to £[✂] per annum to be the more relevant figure for the purposes of its proportionality assessment.

7.23. The GCRA also considers that revenue should be given limited weight where it is associated with malicious, suspicious or harmful activity. The evidence considered in this Proposed Decision indicates that GTs associated with Guernsey and the wider Channel Islands have been linked to malicious or suspicious signalling activity, including recent activity identified in 2026. The GCRA has not concluded that all GT leasing revenue is illegitimate. However, to the extent that any revenue is linked to harmful or suspicious activity, it should not be treated as a benefit which weighs against prohibition. For that reason, the GCRA considers that the revenue impact which should be weighed in the proportionality assessment is likely to be lower than the gross revenue figure stated by Sure.

7.24. The GCRA also considers that the revenue impact is likely to be further mitigated by the availability of alternative arrangements. The GCRA recognises that alternatives may not be perfect substitutes and may require investment, technical changes and customer migration. However, alternatives are recognised internationally as viable ways of supporting a number of use cases currently associated with GT leasing.

7.25. For example, A2P messaging can utilise API-based solutions which would allow customers to send messages through a controlled interface without requiring direct access to leased GTs. For least-cost routing and number authentication services, API-based solutions may allow defined functionality or subscriber information to be provided without giving customers direct SS7 signalling access. Similarly, for outbound roaming use cases, GT modification may be a suitable alternative provided appropriate controls are in place.

7.26. The GCRA notes that Sure has itself identified GT modification as a potentially viable alternative to GT leasing for some use cases. GT modification is not risk-free, and the GCRA considers that it should be subject to appropriate controls where used. However, the availability of GT modification and other alternatives supports the GCRA's view that a prohibition on GT leasing would not prevent Licensed Operators from identifying legitimate alternative means of supporting customers and end-users.

7.27. The impact of moving to alternative arrangements can be further mitigated by giving locally based GT lessors sufficient time to identify, establish and implement appropriate alternative arrangements. The GCRA therefore proposes that the prohibition should take effect on 1 May 2027. This implementation period is intended to give affected Licensed Operators time to review existing arrangements, engage with customers, identify suitable alternatives, build or procure replacement solutions, and ensure that those solutions comply with the proposed licence conditions. The GCRA considers that the availability of alternatives, together with the implementation period to 1 May 2027, materially reduces the detriment to local Licensed Operators.

7.28. The GCRA has also considered whether permitting GT leasing to continue under a rules-based framework would be more appropriate and proportionate, given the revenue benefits identified by Sure. The GCRA does not consider that it would be. The revenue benefits of GT leasing cannot be assessed in isolation. A rules-based framework would introduce additional costs into the Guernsey telecommunications market, because it would require the GCRA to supervise a technically complex and high-risk activity on an ongoing basis.

7.29. The GCRA is not currently resourced to provide that level of supervision. It would likely require additional staff with specialist technical and regulatory knowledge to supervise compliance, review information from Licensed Operators, assess risks and take enforcement action where appropriate. It would also require ongoing consultancy support from specialist network security providers, such as [✂], to obtain intelligence on suspicious or malicious signalling associated with Guernsey GTs. In addition, the GCRA may need access to specialist tools or technical facilities to investigate potential misuse and understand whether Guernsey-associated GTs were being used for harmful activity.

7.30. The GCRA estimates that the cost of establishing and operating such a framework could amount to hundreds of thousands of pounds per year[20]. Those costs would ultimately need to be recovered through the GCRA's licence fee framework, which means they would be borne by Licensed Operators in Guernsey. By contrast, a prohibition on GT leasing is not expected to require the same ongoing supervisory framework or materially increase the GCRA's costs. The GCRA therefore considers that the additional regulatory costs of a rules-

[20] This would include additional staff costs, the cost of third party consultancy support, and appropriate tools to enable the GCRA to monitor and enforce its rules-based framework.

based framework would reduce, and potentially significantly offset, the revenue benefits associated with permitting GT leasing to continue.

7.31. The GCRA also considers that its enforcement powers under the Telecommunications Law are not well suited to a rules-based framework for GT leasing. In particular, the GCRA would generally be required to issue a direction under section 27 before penalties for non-compliance could be imposed. That enforcement model may be appropriate for many regulatory matters, but it is not well suited to high-risk signalling misuse where harmful activity may occur quickly, may be difficult to detect in real time, and may have ended before formal enforcement action can prevent harm.

7.32. For those reasons, the GCRA considers that a rules-based framework would be less effective and more costly to administer than a prohibition. It would leave the central trust and transparency concerns unresolved, require significant regulatory resource, increase costs for Licensed Operators through the licence fee framework, and rely on enforcement powers that are not well suited to preventing fast-moving misuse of signalling access. By contrast, a prohibition is clearer, more targeted, easier to monitor, and better aligned with the States of Guernsey's policy position and the approach taken in the wider +44 numbering environment.

7.33. The GCRA therefore considers that the benefits of prohibiting GT leasing to third parties outweigh the likely adverse impacts. In particular, the GCRA considers that the reduction in risk to end-users, the protection of Guernsey's reputation and +44 numbering resources, the availability of alternative arrangements, the implementation period to 1 May 2027, and the avoidance of a costly and less effective rules-based framework support the conclusion that the prohibition is appropriate and proportionate.

Prohibiting creation of GTs from sub-allocated numbers

7.34. The GCRA also proposes to prevent GTs being created or used from number ranges sub-allocated under condition [X.3(b)] of Part VI.

7.35. This is necessary to prevent the proposed prohibition on GT leasing from being circumvented. Without this rule, a third party could seek to use numbers sub-allocated by a Licensed Operator to create and use GTs itself. In practice, this could produce a similar outcome to GT leasing, because the third party would still be able to access signalling networks using Guernsey-associated numbering resources.

7.36. The GCRA considers that this would undermine the purpose of the prohibition and could reintroduce the same risks of malicious or suspicious signalling by third parties. The proposed condition is therefore intended to ensure that the prohibition is effective, and that GTs are not created or used by third parties from sub-allocated Guernsey number ranges.

Preventing misuse by Licensees and their customers

7.37. The GCRA considers that the proposed prohibition on GT leasing to third parties is necessary, but does not remove all risk of GT-related misuse. Certain services may continue to use GTs as an essential input and may still be capable of generating malicious or suspicious signalling if they are not appropriately controlled.

7.38. This includes services such as GT modification, and authentication services which provide access to, or rely on, signalling functionality. The GCRA recognises that such services may have legitimate uses and do not constitute GT leasing. However, they may also create risks where they allow a customer to generate signalling, obtain network information, access operational data, or otherwise use GT-related functionality in a way that could be misused.

7.39. The GCRA therefore proposes to introduce additional licence conditions requiring Licensees to take all reasonable steps to prevent the generation of malicious signalling where they provide a Licensed Telecommunications Service that is capable of generating such signalling. The proposed conditions are intended to ensure that Licensees remain responsible for the way in which their services, networks and numbering resources are used, including where misuse may arise from the conduct of their customers.

7.40. The proposed conditions would require Licensees, as a minimum, to:

7.40.1. undertake appropriate and proportionate KYC checks before and during the provision of the relevant service;
7.40.2. carry out periodic risk assessments;
7.40.3. document the steps taken to identify, understand and mitigate identified risks;
7.40.4. put in place contractual controls preventing malicious signalling;
7.40.5. implement appropriate technical controls; and
7.40.6. maintain procedures for the effective, fair and timely handling of complaints or information relating to malicious signalling.

7.41. The GCRA expects Licensees to take a risk-based approach when providing such services. The nature and extent of the steps required will depend on the service being provided, the customer, the intended use of the service, the risk of malicious signalling, and any previous evidence or indicators of misuse. Higher-risk services, including GT modification and HLR lookup, are likely to require more extensive controls because of the nature of the signalling access or operational data involved.

7.42. The GCRA has considered whether it would be sufficient to issue guidance on these matters, similar to that issued by Ofcom and the Jersey Competition Regulatory Authority.

7.43. However, given the seriousness of the potential harms associated with misuse identified in this Proposed Decision, and the extent to which alternative arrangements such as GT modification could be similarly misused, the GCRA considers that binding licence conditions are necessary and appropriate. This will provide clearer regulatory obligations and ensure that the GCRA can hold Licensees accountable where services capable of generating malicious signalling are not properly controlled.

7.44. The GCRA also proposes to require Licensees to notify the GCRA promptly where they become aware that a customer of a Licensed Telecommunications Service has generated, or is generating, malicious signalling. The GCRA recognises that this goes further than issuing guidance, but considers a binding notification obligation to be necessary given the evidence of misuse associated with Guernsey and Channel Islands GTs.

7.45. The purpose of the obligation is to ensure that the GCRA is not dependent on overseas regulators, network security specialists or public reporting to identify misuse of Guernsey-associated networks, services or numbering resources. The obligation is intended to be targeted: it would not require notification of every complaint, anomaly or technical issue, but would apply where the Licensee becomes aware of malicious signalling by a customer. In those circumstances, prompt notification is necessary so that the GCRA can understand the issue, assess whether further action is required, and maintain effective oversight of Guernsey-associated signalling risks.

7.46. For the purposes of this obligation, the GCRA expects Licensees to take a risk-based approach to what is "prompt". Where the misuse appears significant, or is likely to cause significant harm, the GCRA would expect notification to be made more quickly. Less urgent notification may be appropriate where the issue appears less significant. In all cases, however, the GCRA would expect to be notified no later than five working days after the Licensee becomes aware that a customer has generated, or is generating, malicious signalling.

7.47. The GCRA therefore considers that the proposed misuse-prevention obligations are necessary, appropriate and proportionate. They complement the prohibition on GT leasing by ensuring that, where GT-related services continue to be provided for legitimate purposes, Licensees must take reasonable and risk-based steps to prevent those services being misused.

Implementation and conclusion

7.48. The GCRA proposes that the new licence conditions would take effect from 1 May 2027. This date is consistent with the position communicated by the States of Guernsey and is intended to provide affected Licensed Operators with a reasonable period to prepare for compliance.

7.49. During that period, affected Licensed Operators will be expected to review existing GT leasing arrangements, engage with affected customers, identify and implement appropriate alternative arrangements, and ensure that any replacement services comply with the proposed licence conditions. This may include developing or procuring alternative technical solutions, putting in place appropriate contractual controls, undertaking risk assessments, and establishing the processes needed to prevent and report malicious signalling.

7.50. The GCRA considers that this implementation period is an important part of the proportionality of the proposed measures. It recognises that some services may need to be migrated, and that alternative arrangements may require technical, operational and commercial changes. However, the GCRA considers that the period to 1 May 2027 provides a reasonable opportunity for Licensed Operators to manage those impacts while ensuring that GT leasing and sub-leasing cease in the Bailiwick.

7.51. The GCRA considers that the proposed licence conditions form a coherent and targeted package. The prohibition on GT leasing to third parties addresses the risks inherent in third-party access to Guernsey-associated signalling resources. The restriction on creating GTs from sub-allocated number ranges prevents circumvention of that prohibition. The misuse-prevention obligations ensure that, where GT-related services continue to be provided for legitimate purposes, Licensees must take reasonable and risk-based steps to prevent those services being misused.

7.52. The GCRA does not propose to prohibit all services which use GTs or signalling-related functionality as an input. The proposed approach is intended to remove the specific risks associated with GT leasing to third parties, while allowing legitimate services to continue where they can be provided in a controlled, transparent and compliant manner.

7.53. For the reasons set out in this section, the GCRA considers that the proposed licence conditions are necessary, appropriate and proportionate. In particular, the GCRA considers that they are required to reduce the risk of end-user harm, protect confidence in Guernsey-associated signalling traffic and +44 numbering resources, give effect to the States of Guernsey's policy position, and ensure that Licensed Operators remain responsible for preventing misuse of services capable of generating malicious signalling.

8. PROPOSED MODIFICATION DECISION AND NEXT STEPS

8.1. The GCRA hereby:

a) gives notice to 5th Dimension (Guernsey) Ltd, Base Limited t/a 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 1 to this proposed licence modification;

b) gives notice to the public of the above proposed licence modification; and

c) requests any written objections or representations from any interested party to this proposed licence modification and its terms as set out in Annex A, before **5pm on Friday 28 August 2026** in the manner and to the address indicated below.

d) Responses can be submitted by email to info@gcra.gg or alternatively in writing to:

GCRA, Suite 4, 1st Floor,
La Plaiderie Chambers, La Plaiderie,
St Peter Port, GY1 1WG

8.2. All written comments should be clearly marked 'Matter T1655G: Global Title Leasing'. The GCRA's normal practice is to publish responses on its website. If any part of a response is considered to be commercially confidential, it should be clearly marked (by highlighting the confidential sections in yellow) when the response is submitted.

8.3. The proposed licence modification and the reasons for it have been notified to holders of those licences to which the proposed modifications related. It will also be published on the GCRA website and in La Gazette Officielle for any public comment and/or objection.

Annex A

Proposed 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 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.