



GUERNSEY NUMBERING SCHEME

LICENCE MODIFICATION

T1667G

PROPOSED DECISION

Date: 05/06/2026

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Contents

- 1. Summary 3**
- 2. Structure of this document..... 3**
- 3. Legal background 3**
- 4. Reasons for the proposed modifications 4**
- 5. Proposed modification decision and next steps..... 8**
- Annex A 9**

1. SUMMARY

- 1.1 This Proposed Decision concerns changes to the telecommunications licences of Licensed Operators in Guernsey relating to the use and management of telephone numbers. The proposed changes form part of a wider framework developed by the GCRA and Ofcom following clarification of the legal arrangements under which Ofcom allocates UK telephone numbers in the Bailiwick of Guernsey (“**the Bailiwick**”).
- 1.2 The proposed licence modifications are intended to support the introduction of the Guernsey Numbering Scheme, under which Licensed Operators in Guernsey will be able to apply to Ofcom for UK telephone numbers and related numbering resources. The proposed changes also introduce a clearer and more modern numbering section within telecommunications licences and align local numbering obligations with relevant parts of the UK’s General Conditions of Entitlement (“**General Conditions**”) and National Telephone Numbering Plan (“**the UK Plan**”).
- 1.3 The proposed licence modifications are set out in Annex A.
- 1.4 The GCRA invites comments and representations from all interested parties regarding the proposed changes¹, including the introduction of a new Part VI entitled “Numbering” into telecommunications licences, and the proposed obligations relating to the application for, use and management of numbering resources in the Bailiwick. Representations must be submitted before 5pm on Friday 3rd July 2026 in the manner and to the address indicated in Section 5.

2. STRUCTURE OF THIS DOCUMENT

- 2.1 This document is structured as follows:

Section 3	Outlines the legal background to the proposed licence modifications.
Section 4	Sets out the reasoning that underpins the proposed licence modifications.
Section 5	Sets out the proposed licence modification decision and next steps.
Annex A	Sets out the proposed modifications to telecommunications licences, including the proposed Guernsey Numbering Scheme.

3. LEGAL BACKGROUND

- 3.1 Section 8(1) of the Telecommunications (Bailiwick of Guernsey) Law, 2001 (“**Telecoms Law**”) provides as follows:

¹ Pursuant to s.8(2) of the Telecommunications (Bailiwick of Guernsey) Law, 2001

“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.”

4. REASONS FOR THE PROPOSED MODIFICATIONS

Background

- 4.1 Telephone numbers and associated numbering resources used by Licensed Operators in Guernsey have historically been administered by Ofcom as part of the United Kingdom numbering framework and the UK Plan. It was understood that provisions within the Communications Act 2003 (“**the Act**”) and the Telecoms Law enabled such an arrangement to exist. Accordingly, the Bailiwick has relied, and continues to rely, on access to +44 telephone numbers and associated numbering resources in order to enable Licensed Operators to provide telecommunications services, meet customer demand, support service expansion, facilitate competition, and ensure the continued effective operation of telecommunications networks in the Bailiwick.
- 4.2 However, during 2024, Ofcom informed the GCRA that it may not have the necessary legal powers under the Act to administer +44 telephone numbers in the Crown Dependencies, as previously understood. Ofcom subsequently confirmed that the Act did not confer jurisdiction on Ofcom to allocate telephone numbers in the Crown Dependencies, and that the Telecoms Law did not clearly provide Ofcom with the necessary authority to exercise that function in Guernsey.
- 4.3 As a consequence, Ofcom paused the allocation and reservation of telephone numbers and network codes for Licensed Operators in the Crown Dependencies until the relevant legal powers were clarified. Licensed Operators in Guernsey have therefore been unable to obtain new telephone numbers or network codes since the middle of 2024.
- 4.4 To resolve this issue, the Governments of the Crown Dependencies (including the States of Guernsey), the UK Government and Ofcom worked together during 2024 and 2025 to establish a coordinated legislative response which would enable Ofcom to continue allocating UK telephone

numbers to operators in the Crown Dependencies. The objective of that work was to preserve the existing practical arrangements under which Ofcom administers UK telephone numbers for use in Guernsey and the other Crown Dependencies.

- 4.5 The Telecommunications (Bailiwick of Guernsey) Law, 2001 (Amendment) Ordinance, 2025 was subsequently made and laid before the States Assembly in March 2025. The Ordinance amended the Law to allow the GCRA to enter into formal arrangements with Ofcom for the establishment and administration of a numbering scheme for use in the Bailiwick.
- 4.6 Following that legislative amendment, the GCRA and Ofcom developed a Memorandum of Understanding (“**MoU**”) and a Guernsey Numbering Scheme. The MoU establishes the working arrangement between, and respective roles of, Ofcom and the GCRA regarding administration of telephone numbering resources in the Bailiwick, whereas the Guernsey Numbering Scheme sets out the numbering rules and processes which apply in the Bailiwick.
- 4.7 Together, these documents establish the legal and operational framework under which Ofcom will administer the allocation, reservation and withdrawal of numbering resources for use in the Bailiwick and constitute “an arrangement” within the meaning of the Telecoms Law, as amended.
- 4.8 Under the terms of the MoU, Ofcom will continue to administer relevant numbering resources from the UK National Telephone Numbering Plan for use in Guernsey. In practice, this means that Licensed Operators will be able to apply directly to Ofcom for the allocation or reservation of telephone numbers and network codes in accordance with the Guernsey Numbering Scheme. Ofcom will assess and determine those applications in accordance with the UK Plan, subject to the modifications and exclusions set out in the Guernsey Numbering Scheme.
- 4.9 The arrangement does not remove the GCRA’s role as the telecommunications regulator for the Bailiwick. The GCRA will remain responsible for issuing and modifying telecommunications licences, monitoring the use of numbers in Guernsey, ensuring compliance with licence conditions, and taking enforcement action where appropriate. The MoU also provides for ongoing cooperation and consultation between Ofcom and the GCRA regarding changes to the Guernsey Numbering Scheme and the UK Plan. Where appropriate, the GCRA will engage with Licensed Operators before providing representations to Ofcom about proposed changes to these framework documents.

Proposed Changes

- 4.10 When agreeing the terms of the MoU, Ofcom and the GCRA considered that it was appropriate and necessary to modify the licences of Licensed Operators in the Bailiwick in order to give effect to the Guernsey Numbering Scheme and ensure that Licensed Operators comply with the rules and processes governing the allocation, use and management of numbering resources in the Bailiwick. The proposed modifications are also intended to align the numbering obligations

applicable to Licensed Operators with some of those applicable to communications providers under the General Conditions and the UK Plan. Specifically, the changes align licences with General Conditions B1.1 to B1.11. This alignment with the General Conditions not only modernises licences in Guernsey, but also better protects end-users of Licensed Telecommunications Services in Guernsey, gives clarity and certainty to Licensed Operators regarding the process for applying for telephone numbers and having allocated numbers withdrawn, requires Licensed Operators to use numbers effectively and efficiently, and makes it easier for Ofcom to administrate the Guernsey Numbering Scheme in a way which is consistent with the rest of the United Kingdom.

- 4.11 Accordingly, the GCRA is proposing to update the numbering provisions in each issued telecommunications licence to give effect to the new numbering framework. The proposed changes to each licence are set out at Annex A.
- 4.12 In addition to removing existing licence conditions which are no longer required, or which conflict with the proposed new numbering conditions (see Annex A), the GCRA is also proposing to make a structural change to relevant telecommunications licences. In particular, the GCRA proposes to remove numbering-related conditions from Part III of licences and insert a new standalone Part VI (“Numbering”) into each relevant fixed and mobile telecommunications licence. The GCRA considers that grouping numbering-related obligations into a dedicated section will improve the structure and accessibility of telecommunications licences and assist future administration, compliance and enforcement activities. Where appropriate, the GCRA may consider adopting a similar structural approach in relation to other licence conditions in future.
- 4.13 The introduction of a dedicated Part VI (“Numbering”) will provide a clearer framework for the future introduction of additional numbering-related obligations where required. This may include obligations relating to Calling Line Identification, the leasing or use of Global Titles, emergency call facilities, and other numbering-related matters which the GCRA may consider necessary or appropriate in the exercise of its statutory functions.
- 4.14 It is proposed that the Guernsey Numbering Scheme be added as a Schedule to each relevant fixed and mobile telecommunications licence. A non-confidential version of the MoU and Guernsey Numbering Scheme shall also be placed on the GCRA’s website.

‘116’ Non-Geographic Numbers

- 4.15 The proposed licence modifications also include obligations relating to “116” telephone numbers. Under the UK Plan, 116 telephone numbers are harmonised 6-digit non-geographic numbers reserved for services of social value, including hotlines and helplines intended to support children, vulnerable persons and individuals experiencing distress, abuse or other forms of harm. These services include, for example, hotlines for missing children, emotional support services, and helplines for victims of abuse or exploitation.

- 4.16 The GCRA considers that children and vulnerable persons in Guernsey must be able to access these services free of charge and in a manner which protects their privacy and safety. Accordingly, the proposed licence modifications require calls and SMS messages to 116 telephone numbers to be suppressed from itemised billing records and similar usage records made available to subscribers. This is intended to ensure that individuals seeking confidential advice, support or protection are not discouraged from contacting these services because of concerns that another person may later discover evidence of the communication through billing information or account records. In some circumstances, disclosure of calls to such services could expose the caller to intimidation, coercion, abuse, retaliation or other forms of harm.
- 4.17 The Guernsey Numbering Scheme excludes the pricing provisions contained within the UK Plan (see paragraph 7(b)). As a result, additional licence conditions are required in order to ensure that access to 116 numbers in Guernsey is provided on a free-to-caller basis. The proposed licence modifications therefore require Licensed Operators to provide free access to 116 telephone numbers and to suppress records of calls and SMS messages to those services from itemised billing information.
- 4.18 In February 2026, Licensed Operators were asked to provide information regarding the rates charged to customers for calls to UK geographic and non-geographic telephone numbers. Where necessary, this included the likely cost and revenue implications of introducing a free-to-caller requirement for 116 telephone numbers. Responses were received from JT (Guernsey) Limited (“JT”) and Sure (Guernsey) Limited (“Sure”). JT explained that [REDACTED]. Sure explained that [REDACTED].
- 4.19 Having considered the information provided by respondents, it is considered that the likely costs associated with these obligations are modest and significantly outweighed by the public interest benefits of ensuring that children and vulnerable persons in Guernsey can access important support services safely, confidentially and without financial barriers. It is also considered important that individuals seeking urgent assistance from abuse support services, crisis helplines or similar services are not discouraged from accessing those services because of concerns relating to call charges or the possibility of those communications being identified by another person through billing records or account information.
- 4.20 Accordingly, the GCRA has introduced new licence conditions requiring calls to 116 numbers to be provided on a free-to-caller basis and requiring calls and SMS messages to such services to be suppressed from itemised billing records and similar usage documentation. It is proposed that these conditions would come into effect on the date of publication of the Final Decision.

5. PROPOSED MODIFICATION DECISION AND NEXT STEPS

5.1 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), JT (Guernsey) Ltd, Logicalis Guernsey Ltd, Ninou Investments Ltd t/a GuernseyTel, 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,
- c) requests any written objections or representations from any interested party to this proposed licence modification and its terms as set out in Annex 1, before 5pm on Friday 3rd July 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

5.2 All written comments should be clearly marked 'Matter T1677G: Proposed Licence Modification'. 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.

5.3 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/amending the following definitions:

“Allocate”: means, in relation to a Number, allocation of that Number by Ofcom under the Guernsey Numbering Scheme and the term “Allocated Number” shall be construed accordingly;

“Adopt”: means the doing of any of the following by a Licensee in relation to Allocated Numbers (whether or not such Numbers are Allocated to that Licensee):

- (a) Assigning or transferring that number to a particular Subscriber or Telecommunications Apparatus;
- (b) Using that Number for identifying a service or route used by that Licensee or any of its Subscribers;
- (c) Using that Number for identifying a communication as one to be transmitted by that Licensee;
- (d) Designating that Number for use in selecting a service or the required elements or characteristics of a service; or
- (e) Authorising the use of that Number by others for any of the following purposes:
 - i. Identifying the destination for, or recipient of, an Electronic Communication;
 - ii. Identifying the origin, or sender, of an Electronic Communication;
 - iii. Identifying the route for an Electronic Communication;
 - iv. Identifying the source from which an Electronic Communication, Licensed Telecommunications Service or Licensed Mobile Telecommunications Service may be obtained or accessed;
 - v. selecting the service that is to be obtained or accessed, or required elements or characteristics of that service;
 - vi. Identifying the Licensee by means of whose network or service an Electronic Communication is to be transmitted, or treated as transmitted.

“Assigned”: means (in relation to Numbers) where Numbers are transferred to end users, i.e. individuals and businesses.

“Electronic Communication”: means a communication for transmission by means of a Licensed Telecommunication Network or Licensed Mobile Telecommunications Network.

“General Conditions”: means Ofcom’s General Conditions of Entitlement published on its website and as may be amended from time to time;

“Guernsey Licence”: means a telecommunications licence granted to a telecommunications operator by the GCRA pursuant to section 2 of the Telecommunications Law;

“Guernsey Numbering Scheme”: means the numbering scheme for the Bailiwick of Guernsey established and maintained by Ofcom;

“Numbering Scheme”: means the method adopted or to be adopted for allocating and re-allocating a Number;

“Short Message Service” or “SMS”: means a text message delivered to a Subscriber’s handset or, if SMS is superseded or withdrawn, an equivalent text communication sent directly to the Subscriber’s handset.

“Sub-allocate”: means where Numbers are transferred by a Licensee to another Licensee;

“UK Act”: means the Communications Act 2003 (as amended)

“UK Plan”: means the National Telephone Numbering Plan published by Ofcom pursuant to section 56 of the UK Act and setting out the telephone numbers available for allocation in the UK and any restrictions on how they may be adopted or used in the UK.

2. The GCRA proposes to remove the Licence Condition entitled “Numbering” from each mobile and fixed telecommunications licence as follows:

[X] NUMBERING

- ~~3.1 The Licensee shall use only those Numbers that are allocated to it for the purpose of terminating messages on the Licensed Telecommunications Network and shall comply with any directions concerning use and allocation which are issued by the GCRA from time to time.~~
- ~~3.2 The Licensee shall manage any Numbers allocated to it with a view to conserving Numbers as a public resource and shall maintain a record of the status of all Numbers allocated to it and on request, shall provide that information to the GCRA.~~
- ~~3.3 The Licensee shall not charge its customers for allocations of Numbers except where authorised and in accordance with any direction from the GCRA.~~
- ~~3.4 The Licensee shall comply with any directions issued by the GCRA in respect of Number Portability.~~

3. The GCRA proposes to insert a new Part VI into each fixed and mobile telecommunications licence as follows:

PART VI: NUMBERING

- [X.1] This Licence incorporates and is subject to the Guernsey Numbering Scheme, which forms Schedule [X] of this Licence. The Licensee shall comply with the terms of the Guernsey Numbering Scheme.
- [X.2] If the Licensee wishes to obtain an Allocation or reservation of Numbers in the UK Plan, it must:
- (a) use Ofcom's online number management system or, if that system is unavailable, the application form made available on the Ofcom website from time to time;
 - (b) provide such information as is required by such system or application form; and
 - (c) provide to Ofcom, on request, any other information considered by Ofcom to be relevant to the application, and the supply of which does not place an undue burden on the Licensee.
- [X.3] The Licensee shall not Adopt Numbers from the UK Plan unless:
- (a) those Numbers have been Allocated to the Licensee; or
 - (b) the Licensee has been authorised (either directly or indirectly) to Adopt those Numbers by the person to whom those Numbers have been Allocated.
- [X.4] Where a Number has been Adopted under [X.3](b), the Licensee shall comply with the conditions of this Licence and any directions issued to the Licensee by the GCRA under this Licence or the Telecommunications Law.
- [X.5] The Licensee shall comply with all applicable restrictions and requirements as are set out in the UK Plan unless any restrictions or requirements are stated in the Guernsey Numbering Scheme as not applying in the Bailiwick.
- [X.6] The Licensee shall provide access to services of social value via 6-digit non-geographic Numbers, as defined in paragraph B3.5 of the UK Plan, free of charge to the caller.
- [X.7] The Licensee shall ensure that any Subscriber can access a hotline for missing children by using the Number "116000".
- [X.8] In accordance with Condition [X.4]², the Licensee shall ensure that any calls or SMS to 116XXX Numbers are not identified in the Subscriber's itemised billing or any other records that the Licensee makes available to the Subscriber.
- [X.9] The Licensee must:

² "The Licensee shall provide each of its Subscribers with an acceptable level of itemised billing for international calls, at no additional charge. On request by a Subscriber, the Licensee shall also provide itemised billing for local calls at a reasonable charge. The itemised bill produced by the Licensee shall in all cases provide sufficient detail to facilitate verification of charges incurred by the Subscriber in using the Licensed Mobile Telecommunications Services. Calls which are free of charge to the User because they are calls to the emergency numbers and the emergency access codes referred to in Condition 13.2, and similar codes, shall not be identified in the subscriber's itemised bill."

- (a) ensure that any Numbers that have been allocated to it are, and continue to be, used effectively and efficiently. This includes, but is not limited to, ensuring that Numbers allocated to it are not misused, including to facilitate scams or other criminal activity.
- (b) take all reasonably practicable steps to ensure that any Numbers that the Licensee has Sub-allocated or Assigned to a customer are being used effectively and efficiently. This includes, but is not limited to, ensuring that Numbers so Sub-allocated or Assigned are not misused, including to facilitate scams or other criminal activity.

[X.10] In the event that:

- (a) the Licensee fails to comply with a direction given by the GCRA under the Telecommunications Law in respect of the Licensee's use of Numbers from the UK Plan; and/or
- (b) the Licensee ceases to be a Licensee under Section 2 of the Telecommunications (Bailiwick of Guernsey) Law, 2001, as amended.

the GCRA may recommend to Ofcom that Ofcom withdraw some or all of the Numbers allocated to the Licensee.

[X.11] Where the GCRA considers it is appropriate for Ofcom to withdraw all or some of the Numbers allocated to the Licensee, the GCRA will:

- (a) inform the Licensee that the GCRA intends to recommend to Ofcom that those Numbers are withdrawn (**Proposed Recommendation**); and
- (b) before it makes any Proposed Recommendation give the Licensee a reasonable opportunity to make written representations and/or objections in relation to that Proposed Recommendation; and
- (c) consider any such written representations and/or objections before deciding whether or not to proceed with the recommendation.

[X.12] The Licensee shall not charge the Subscriber to Adopt Numbers, except where authorised by the GCRA.

[X.13] The Licensee shall comply with any directions issued by the GCRA in respect of Number Portability.

4. The GCRA proposes to add a schedule to each fixed and mobile telecommunications licence containing the Guernsey Numbering Plan as follows:

Guernsey Numbering Scheme

A. Background

1. Section 11(1A) of the Telecommunications (Bailiwick of Guernsey) Law, 2001, as amended (the **Law**) explains that:

For the avoidance of doubt, and in accordance with section 1(2) of the Communications Act 2003 as extended to the Bailiwick, under subsection (1) [of the Law] the [Guernsey Competition and Regulatory Authority (GCRA)] may enter into an arrangement with Ofcom under which Ofcom shall have the function of establishing a Guernsey Numbering Scheme in the Bailiwick, including (for the avoidance of doubt) the power to do anything incidental or conducive to the carrying out of that function, and such a scheme shall be susceptible to modification by Ofcom after consultation with the [GCRA].”

2. This document constitutes the numbering scheme for the Bailiwick of Guernsey (the **Guernsey Numbering Scheme**), as defined in section 31 of the Law. It has been established pursuant to section 11(1A) of the Law and the arrangements set out in the Memorandum of Understanding between Ofcom and the Guernsey Competition and Regulatory Authority (**GCRA**) dated [...], as amended.
3. In accordance with section 11 of the Law, so far as is practicable and in accordance with international best practice, this Guernsey Numbering Scheme:
 - (a) takes into account the needs of licensees and users in the Bailiwick; and
 - (b) promotes the efficient use of numbers in the Bailiwick.
4. This Guernsey Numbering Scheme, including the steps Ofcom will carry out in accordance with this Guernsey Numbering Scheme, will facilitate the carrying out of Ofcom’s numbering functions under sections 1(2) and 56 – 63 of the UK Communications Act 2003 (the **UK Act**) and section 11 of the Law.
5. References to licensees in this Guernsey Numbering Scheme are references to licensees as defined in section 31 of the Law. Except in so far as the context otherwise requires, other words or expressions shall have the meaning assigned to them in the Law.

B. Application of the UK National Telephone Numbering Plan

6. Ofcom is required under section 56 of the UK Act to publish a National Telephone Numbering Plan, setting out the telephone numbers available for allocation in the UK and any restrictions on how they may be adopted or used in the UK (the **UK Plan**). The UK Plan is published on Ofcom’s website and amended from time to time.
7. For the purposes of this Guernsey Numbering Scheme the UK Plan should be read as setting out the telephone numbers available for allocation in the Bailiwick and any restrictions on how they may be adopted or used in the Bailiwick subject to the following parts being excluded:
 - (a) Section B3.8 of the UK Plan relating to Global Titles;
 - (b) Section B4 and Section C6 of the UK Plan relating to tariff principles and maximum prices;

- (c) References to 'Applicable tariff principles and maximum prices' in Part A1 and Part C5 of the UK Plan; and
 - (d) The Definition of 'Unbundled Tariff Number' in the 'Definitions and interpretation' section of the UK Plan.
8. For the purposes of the Guernsey Numbering Scheme, references to communications providers within the UK Plan should be read as references to licensees and other words or expressions in the UK Plan should be construed as relating to licensees in the Bailiwick that that use numbers in the UK Plan.

C. Applications for numbers

9. Licensees can apply to Ofcom for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey by:
- (a) using Ofcom's online number management system or, if that system is unavailable, the application form made available on the Ofcom website from time to time;
 - (b) providing such information as is required by such system or application form; and
 - (c) providing to Ofcom, on request, any other information considered by Ofcom to be relevant to the application, and the supply of which does not place an undue burden on the Licensee.
10. Ofcom will determine, taking into account the provisions of the UK Plan, any application for telephone numbers by the end of the period of three weeks after the date of the receipt by it of the completed application form. Where Ofcom has required any additional information in relation to any application, Ofcom will determine the application by the end of the period of three weeks after the date of the receipt by it of that additional information.
11. Ofcom may deny an application for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey, including where:
- (a) the applicant is not a Licensee;
 - (b) the Licensee has not provided Ofcom with the information required by Ofcom under paragraph 9 above by any deadline set by Ofcom;
 - (c) Ofcom does not consider granting the allocation or reservation of telephone numbers will ensure the best and most efficient use of numbers including where:
 - (i) Ofcom is concerned that the Licensee's intended use of the telephone numbers or the arrangements or processes it has in place will not enable it to comply with this Guernsey Numbering Scheme or any restrictions or requirements Ofcom may intend to apply to the specific telephone numbers the Licensee has applied for (taking into account any evidence of existing non-compliance by the Licensee);
 - (ii) taking into account the Licensee's intended use of the telephone numbers, Ofcom does not consider it necessary for the Licensee to be allocated or reserved all or some of the telephone numbers it has applied for;

(iii) taking into account any evidence that scams or other criminal activity are taking place on telephone numbers already allocated to the Licensee, Ofcom is concerned that the arrangements or processes the Licensee has in place are insufficient to prevent scams or other criminal activity on any new telephone numbers Ofcom may allocate or reserve for the Licensee; or

(iv) the GCRA has provided information to Ofcom indicating that the application should be denied, including but not limited to that (1) the Licensee is not, or is no longer, a fit and proper person to whom numbers should be allocated or for whom numbers should be reserved; or (2) the GCRA has provided information to Ofcom indicating that the Licensee has repeatedly or seriously breached its licence conditions relating to numbering.

12. Where Ofcom denies an application for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey, it shall provide the Licensee with reasons for that denial which enable the Licensee to understand any steps it would need to take to address Ofcom's concerns.

13. Licensees can submit a new or amended application (in accordance with the process set out in paragraph 9 above) for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey at any time after they have addressed Ofcom's concerns and Ofcom shall determine that application in accordance with paragraph 10 above.

14. Where Ofcom grants an application for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey, it may also identify any restrictions or requirements applicable to the specific telephone numbers the Licensee has been allocated or reserved.

15. In accordance with the arrangements in Section F of the MoU, Ofcom will notify the GCRA of any application for an allocation or reservation of telephone numbers in the UK Plan for use in Guernsey, and any proposal to grant or deny such application. Ofcom will take due account of any information provided by the GCRA before making its decision.

D. Withdrawal of numbers

16. Ofcom may withdraw ranges of telephone numbers in the UK Plan that have been allocated to a Licensee in the circumstances identified in the MoU, including on the recommendation of the GCRA.

17. Licensees may apply to Ofcom for the withdrawal of numbers in the UK Plan allocated to them using Ofcom's online number management system or, if that system is unavailable, the application form made available on the Ofcom website from time to time.

E. Modification of this Guernsey Numbering Scheme

18. Ofcom may consider it necessary to modify this Guernsey Numbering Scheme from time to time after consultation with the GCRA.