



**GSMA comments to the BEREC public consultation the document:
“Guidelines on common criteria for the assessment of the ability to manage numbering resources by undertakings other than providers of electronic communication networks or services and of the risk of exhaustion of numbering resources if numbers are assigned to such undertakings.”**

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The GSMA, which represents the interests of mobile operators worldwide, hereby would like to provide its comments to BEREC on its public consultation on numbering assignments procedures and hopes the following comments can serve as a constructive contribution to BEREC’s work.

1. Comments on the use cases and numbering resources

Scenarios

- a) Use of the assigned resources in a scenario where OTA is used;*
- b) Use of the assigned resources in a scenario where OTA is not used.*

When considering the above scenarios, it is worth noting that M2M/IoT OTA solutions are already available and in use. M2M/IoT Service providers are connectivity solutions customers and can choose to adopt OTA based solutions or not, but this option is most often available to them. As such, when considering the need to extend the use of numbering resources, BEREC should safely assume that OTA is already an available option to most providers and use cases.

Q1: In your opinion, what could be the use cases in which a non-ECN/ECS entity manages the numbering resources by itself without becoming an ECN/ECS provider and without a support of an ECN/ECS provider in the two alternative scenarios a) and b) above?

The GSMA has no knowledge of such use cases and as such believes that there is no current demand.

Q2: In your opinion, what could be the use cases in which a non-ECN/ECS entity manages only certain aspects of the numbering resources without becoming an ECN/ECS provider and relies on the help of an ECN/ECS for the remaining management, based on a contractual agreement, in the two alternative scenarios a) and b) above?

Services related to utilities, smart metering and automotive services may have an interest in having a

number associated to their services, but to this day, the preferred model is to cooperate with a provider of ECN/ECS on a contractual basis to provide numbering resources, ensure connectivity and coverage.

Q3: Please also indicate, for the presented use cases, what types of numbering resources (i.e. E.164, E.212, E.118, Signalling Point Codes (Q.708) and Operator identifiers (e.g. M.1400)) should be assigned to non-ECN/ECS entities. If possible, explain why or why not

As already mentioned to Q1 and Q2, GSMA sees no need and accordingly does not support the assignment of numbering resources to non ECN/ECS entities by NRAs.

Specifically, GSMA will strongly advise against the assignment of MNC to non-ECN/ECS entities due to the risk of scarcity. Accordingly the E.212 identification plans should not be modified, and in the case of assignment to non-ECN/ECS entities compliance with international interoperability standards as defined by ITU-T, ETSI and GMSA should be nationally assured and preserved beforehand. GSMA believes that the remote provisioning of eSIMs is more efficient and is likely to have lower implementation costs. The remote provisioning of Embedded SIM addresses concerns regarding the ability to switch connectivity providers for IoT connected devices. The use of a remote provisioning capability provides a solution that enables providers to select a connectivity partner at a later stage in the product lifecycle as well as facilitation the ease of switching connectivity provider.

This said, it is already possible for non-ECN/ECS entities to acquire E.164 and E.212 resources based on ITU and some NRA decisions. In some jurisdictions, non-ECN/ECS entities already today acquire E.118 identifiers – principally for the manufacture of eSIMs, however this is incorrect use of E.118 and GSMA is working to correct this. E.118 values should be used for ICC-ID only to ensure the functioning of global mobility management and global roaming. BEREC are requested to indicate this in their subsequent guidelines. Signaling Point codes and Operator Identifiers (M.1400) are all related to the availability of a network or are internal to networks, and should as such be excluded from the guidelines.

2. Comments on the proposed criteria for the assessment of the ability to manage numbering resources for non-ECN/ECS entities

Q4: Please, describe your opinion on this section and in particular with respect to the proposed criteria for the assessment of the ability to manage numbering resources.

European regulators should ensure a level-playing field with regards to the criteria applicable to current and future providers of ECN/ECS and those of non-ECS/ECN when assessing the latter's ability to manage numbering resources. Special attention should be provided both at EU- and national level to the increased risk of fraud and security with the inclusion of entities, which are not subject to the same level of security demands as authorized providers of ECN/ECS, and therefore, a careful assessment of the security risks should be undertaken.

Additionally, GSMA believes that national regulators can help communications providers reduce the risk of number resource misuse by enforcing stricter management of national numbering resources. Specifically, regulators can:

- Ensure national numbering plans are easily available, accurate and comprehensive

- Implement stricter controls over the assignment of national number ranges to applicants and ensure the ranges are used for the purpose for which they have been assigned
- Implement stricter controls over leasing of number ranges by number range assignees to third parties

3. Comments on the proposed criteria for the assessment of the risk of exhaustion of numbering resources for non-ECN/ECS entities:

Q5: Please, describe your opinion on this section and in particular with respect to the proposed criteria for the assessment of the risk of exhaustion of numbering resources.

As under Q4, where a NRA/CA is assessing the risk of exhaustion of numbering resources, the approach of that authority should be the same for non-ECN/ECS entities as for providers of ECN/ECS.

NRAs/CAs should in addition to monitoring already assigned resources, provide a forecast on the demand models on a regular basis in order to predict potential number exhaustion. As indicated under Q3, GSMA will strongly advise against the assignment of E.212 resources such as MNC to non-ECN/ECS entities due to the risk of scarcity.