



Digicel's Response
to
The Office of Utilities Regulation's Consultation Document
on
Review of the International Mobile Subscriber Identity (IMSI)
Assignment Guidelines

January 20, 2023

Note: This document should be read in conjunction with the Office of Utilities Regulation's Consultation Document on the Review of the International Mobile Subscriber Identity (IMSI) Assignment Guidelines, dated 2022 December 09

PRELIMINARY COMMENTS:

Digicel (Jamaica) Limited (“Digicel”) thanks the Office of Utilities Regulation (“OUR”) for providing the opportunity for us to respond to the Consultation Document concerning the Review of the International Mobile Subscriber Identity (IMSI) Assignment Guidelines, dated 2022 December 09 (the “Consultation Document”). We are available and would be happy to engage in further discussions on any aspect of this response.

The responses provided herein are not exhaustive and our decision not to respond to any particular issue(s) raised in the aforementioned Consultation Document does not necessarily represent agreement, in whole or in part, nor does any position taken by us in this document represent a waiver or concession of any sort of our rights in any way. Digicel expressly reserves all its rights in this matter generally. Please do not hesitate to refer any questions or remarks that may arise as a result of the responses herein to:

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Digicel's Response

1. Digicel has reviewed the Consultation Document and notes that the OUR is proposing the expansion of the eligibility criteria for the assignment of International Mobile Subscriber Identities (IMSI) in Jamaica to include networks that utilise fixed wireless access to provide business and residential voice and broadband access services. The OUR is therefore proposing the assignment of Mobile Network Codes (MNCs) to entities that use mobile technology to provides these fixed wireless services.

Risks & Safeguards –

2. Digicel reiterates the concern raised in our Response to the Consultation by the Office of Utilities Regulation on the Review and Revision of the Jamaican National Numbering Plan & the Telecommunications Numbering Rules dated August 30, 2019. In this document, we highlighted the risks associated with providing traditionally mobile only numbering resources to fixed operators without an associated mobile arm to include the possibility that these allocations could be used in conjunction with technologies such as eSIM to bypass the Jamaican licensing regime for mobile services and, for example, offer outbound roaming services. We are happy that the OUR has taken note of this concern as highlighted at paragraph 5.1.8 of the Consultation Document and note the OUR's response that enforcement proceedings under the Act will be initiated where it is found that fixed carriers are operating in breach of their licence. We however submit that the OUR should consider measures and safeguards that can be put in place for the prevention and/or early detection of these breaches. In this regard, the OUR's statement at paragraph 5.1.7 of the Consultation Document concerning its awareness of the various technical approaches that exist for ensuring that the service provided to a fixed wireless subscriber remain fixed is relevant. It is submitted that in its review of applications for MNCs by fixed wireless operators without an associated mobile arm, the OUR should ensure that the applicant has these arrangements in place so as to prevent the MNC from being used to facilitate mobile services.

Maintenance of Existing MNC Assignments -

3. Digicel submits that existing MNC assignments should be maintained and that the proposed expansion of the eligibility criteria for MNC assignment should not impose or require any disruption or change of existing assignments. Digicel therefore supports the proposed amendment to section 5.12 of the IMSI Assignment Guidelines which provides that the new guidelines will have no effect on MNC assignments made prior to the effective date.

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