Office of Utilities Regulation

Review of the International Mobile Subscriber Identity (IMSI) Assignment Guidelines

Determination Notice



2025 March 26

DOCUMENT TITLE AND APPROVAL PAGE

1. DOCUMENT NUMBER: 2025/TEL/005/DET.001

DOCUMENT TITLE: Review of the International Mobile Subscriber Identity (IMSI) Assignment Guidelines **Determination Notice**

2. PURPOSE OF DOCUMENT

This document sets out the Office of Utilities Regulation's Determinations on amendments to the International Mobile Subscriber Identity (IMSI) Assignment Guidelines.

3. ANTECEDENT DOCUMENTS		
Publication Number	Publication Title	Publication Date
2009/01:Det/01	International Mobile Subscriber Identities (IMSI) Assignment Guidelines included as Annex 2 in the Telecommunications Numbering Rules and Number Assignment Guidelines (Document Number: 2020/TEL/008/RUL.001 and dated 2020 May 26)	2007 January 31
2022/TEL/012/CON.002	Pariant of the International Mahile Cukerikan Identity	2022 December 09

APPROVAL

This document is approved by the Office of Utilities Regulation and the decisions therein become effective on 2025 March 31.

On behalf of the Office:

Ansord E. Hewitt Director-General

Date

Abstract

The evolution of telecommunication networks has led to the blurring of lines between previous network siloes for different services. As networks evolve and can provide services using a converged network platform there arises a need for reconsideration of previous regulatory arrangements for items such as telecommunications numbering resources.

One such example has been the International Mobile Subscription Identity (IMSI) resource and its possible use as an identifier for subscribers seeking to access services other than mobile services. The issue has arisen due to the emergence of modern telecommunication networks such as Long-Term Evolution (LTE) networks that can support the delivery of converged services. The ability of networks to support the delivery of both fixed and mobile service offerings has resulted in IMSIs being used in a manner that was not contemplated at the time the existing IMSI Assignment Guidelines were drafted.

Consequently, the OUR embarked on a consultation process to review the provisions of the International Mobile Subscriber Identity (IMSI) Assignment Guidelines. This Determination Notice presents the Office's responses to issues raised by stakeholders who commented on the Consultation Document entitled "Review of the International Mobile Subscriber Identity (IMSI) Assignment Guidelines (Document No: 2022/TEL/012/CON.002). The Determination Notice also sets out the modifications that will be made to the IMSI Guidelines as determined by the Office.

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Glossary

In this document, unless the context otherwise requires, the following terms will have the meanings specified below:

- 1. "Act" means the Telecommunications Act.
- 2. "Consultation Document" refers to the Consultation Document published by the Office of Utilities Regulation ("OUR") on 2022 December 09 entitled "Review of the International Mobile Subscriber Identity (IMSI) Assignment Guidelines" (Document No. 2022/TEL/012/CON.002)
- 3. "Digicel" means Digicel (Jamaica) Limited
- 4. "Fixed Wireless Access (FWA)" refers to the use of fixed or nomadic radios to provide access to a public telecommunications network for the provision of voice and/or data services. These systems may also provide services for private networks.
- 5. "Guidelines" and "IMSI Assignment Guidelines" refer to the Office of Utilities Regulation's (OUR's) International Mobile Subscriber Identity (IMSI) Assignment Guidelines dated 2007 January 31 and set out in Annex 2 of the Telecommunications Numbering Rules and Number Assignment Guidelines (Document No. Tel 2009/01:Det/01 published by the OUR.
- 6. "International Mobile Subscription Identity (IMSI)" means a string of decimal digits, up to a maximum length of 15 digits, which identifies a unique subscription.
- 7. "Licensee" has the same meaning as in the Act.
- 8. "Office" and "OUR" mean the Office of Utilities Regulation.
- 9. "OUR Act" means the Office of Utilities Regulation Act.
- 10. "Service Provider" has the same meaning as in the Act.

Abbreviations

CACU Consumer Advisory Committee on Utilities

FWA Fixed Wireless Access

IMSI International Mobile Subscription Identity

ITU International Telecommunication Union

JNNP Jamaica National Numbering Plan

MCC Mobile Country Code

MNC Mobile Network Code

MNO Mobile Network Operator

MSIN Mobile Subscription Identification Number

OUR Office of Utilities Regulation

SIM Subscriber Identity Module

SMA Spectrum Management Authority

Chapter 1: Introduction

1.1 Background

- 1.1.1 Pursuant to Section 8 of the Telecommunications Act ("the Act") the Office of Utilities Regulation ("OUR" and "Office") has statutory responsibility for the administration and management of telecommunications numbering resources within Jamaica. As a part of these responsibilities, the OUR is tasked with the development of a numbering plan and to make rules based on that plan.
- 1.1.2 This resulted in the OUR developing and publishing the Jamaica National Numbering Plan Determination Notice (Document No. Tel/ 2003/10) ("JNNP") in 2003 and subsequently the Telecommunication Numbering Rules (Document No. Tel 2009/01:Det/01) that was published in 2009. This was followed by the development and publication of several subsidiary documents, called "Assignment Guidelines" which were developed to govern the assignment and use of the different numbering resources that are directly and indirectly administered by the OUR. One such document is the International Mobile Subscriber Identity (IMSI) Assignment Guidelines ("the Guidelines") (Document No. Tel 2009/01:Det/01) which was published in 2007 January 31 and which was included as Annex 2 in the Telecommunications Numbering Rules and Number Assignment Guidelines (Document No. 2020/TEL/008/RUL.001) published in 2020.
- 1.1.3 The ITU defines the IMSI as "a string of decimal digits, up to a maximum length of 15 digits, which identifies a unique subscription". The IMSI consists of three fields. The first field of an IMSI (three digits) represents the Mobile Country Code ("MCC"), which is an E.212 resource assigned by the ITU, and which identifies a country. The second field represents the Mobile Network Code ("MNC") which can be two or three digits (three digits in the case of the North American standard which Jamaica follows). The MNC is assigned by the respective national numbering plan administrator and identifies a particular network within a country. The third field of an IMSI is the mobile subscription identification number ("MSIN"). The MSIN is administered by an MNC assignee to identify individual subscriptions on its network.

¹ International Telecommunication Union (ITU). Available at: https://www.itu.int/rec/dologin_pub.asp?lang=e&id=T-REC-E.212-202406-I!!PDF-E&type=items. In force as at 06/2024

- On 2019 July 22, the OUR published the Consultation Document entitled "Review and Revision of the Jamaican National Numbering Plan & The Telecommunications Numbering Rules Phase 1" (Document No. 2019/TEL/004/CON.002). In that document, the OUR proposed that the eligibility criteria for the assignment of MNCs be extended to include operators of networks other than mobile networks. In the corresponding Determination Notice entitled Review and Revision of the Jamaican National Numbering Plan and Dialling Plan & The Telecommunications Numbering Rules Determination Notice, which was published on 2020 May 26, the OUR indicated that, based on stakeholders' feedback, it would conduct further consultation on the issue.²
- 1.1.5 In deciding to review the IMSI Assignment Guidelines, the need to facilitate increased broadband deployment as well as the need to ensure that the Guidelines were reflective of technological developments in the sector were key considerations. The technological developments include the increased use of fixed wireless access networks and satellite-based networks as a means for bridging the internet coverage gap. Over the 2020-2022 period, most of the applicants for internet service provider licences indicated their intent to utilize fixed wireless access networks or satellite-based networks to deliver the service. The use of IMSIs within such networks as a means of authenticating their subscribers has been raised by some of these applicants.
- 1.1.6 On 2022 December 09, the OUR published a Consultation Document entitled "Review of the International Mobile Subscriber Identity (IMSI) Assignment Guidelines" (Document No. 2022/TEL/012/CON.002) ("the Consultation Document"). The document raised various matters for consideration in relation to the revision of the IMSI Assignment Guidelines to allow for the extension of the eligibility criteria. It also outlined the proposed amendments to the Guidelines which would be required to facilitate such an extension.

1.2 Purpose of the Document

This Determination Notice specifies the modifications that have been determined by the Office that will be made to the IMSI Assignment Guidelines to ensure that they are reflective of the needs of the telecommunications sector and facilitate increased broadband access.

² Office of Utilities Regulation (2020). The Jamaican National Numbering Plan and Dialling Plan & The Telecommunications Numbering Rules Determination Notice (Document Number 2020/TEL/006/DET.002).

1.3 Structure of the document

- Chapter 2 outlines the Legal Framework that describes the remit of the Office regarding the telecommunications sector, as well as the Office's ongoing role of regulatory oversight for the management and administration of the island's telecommunications numbering resources such as the MNCs that form a part of the IMSI resource.
- Chapter 3 provides a summary of the comments received from stakeholders on the proposed modifications to the IMSI Assignment Guidelines in the Consultation Document, the Office's response to stakeholders' comments, and provides the Office's final determination on the issues.

Chapter 2: Legal Framework

2.1 General Provisions

- 2.1.1 The OUR was established under the Office of Utilities Regulation Act ("OUR Act") with the power to regulate "prescribed utility services." Section 2 and the First Schedule of the OUR Act defines "prescribed utility services" to include "the provision of telecommunication services."
- 2.1.2 The power and authority of the OUR to regulate the telecommunications sector is governed by the provisions of the OUR Act and the Telecommunications Act ("the Act").
- 2.1.3 Section 4(1) of the OUR Act permits the OUR, among other things, to:
 - "(a) regulate the provision of prescribed utility services by licensees or specified organizations;
 - (c) conduct such research as it thinks necessary or desirable for the purposes of the performance of its functions under this Act;
 - (e) subject to section 8A carry out, on its own initiative or at the request of any person, such investigations in relation to the provision of prescribed utility services as will enable it to determine whether the interests of consumers are adequately protected."
- 2.1.4 Section 4(3) of the OUR Act empowers the OUR to undertake such measures, as it considers necessary and desirable, to inter alia:
 - "(a) encourage competition in the provision of prescribed utility services;
 - (b) protect the interests of consumers in relation to the supply of a prescribed utility service;
 - (d) promote and encourage the development of modern and efficient utility services; ..."
- 2.1.5 The Act also grants the OUR general regulatory oversight of the telecommunications sector. Some of the relevant provisions of the Act that describe the objects of the Act and

the OUR's powers and functions in relation to the telecommunications sector are as follows:

- "3. The objects of this Act are -
- (a) to promote and protect the interest of the public by-
 - (i) promoting fair and open competition in the provision of specified services and telecommunications equipment;
 - (ii) promoting access to specified services; ..."
- "4. (1) The Office shall regulate telecommunications in accordance with this Act and for that purpose the Office shall –
- (a) regulate specified services and facilities.
- (d) promote the interests of customers, while having due regard to the interests of carriers and service providers;
- (g) promote competition among carriers and service providers;..."
- (3) In exercise of its functions under this Act, the Office may have regard to the following matters –
- (a) the needs of the customers of the specified services;
- (b) whether the specified services are provided efficiently and in a manner designed to
 - (iii) afford economical and reliable service to its customers;
- (c) whether the specified services are likely to promote or inhibit competition."

2.2 Number Administration and Management

- 2.2.1 Section 8 of the Act gives the OUR specific powers concerning the management and assignment of numbering resources to be used with telecommunication services. Some of the provisions are as follows:
 - "8(1) The Office shall assign numbers for telecommunications services to carriers and service providers on a non-discriminatory basis.

- (2) In carrying out its functions under this section the Office shall develop a plan for the numbering of telecommunications services and may make rules pursuant to that plan regarding the assignment and use of numbers by carriers and service providers.
- (3) For the purpose of subsection (2) the Office shall –
- (a) take account of relevant international regulations.
- (b) ensure that sufficient numbers are available for the current and reasonably anticipated future needs of carriers and providers;

٠..

- (d) promote efficient use of numbers;
- (e) promote fair and open competition ..."
- 2.2.2 In accordance with those powers, the OUR has established a number administration and management framework which includes the IMSI Assignment Guidelines (the "Guidelines"). The IMSI Assignment Guidelines, set out as Annex 2 of the OUR's Telecommunications Numbering Rules and Number Assignment Guidelines³, govern the assignment and use of MNCs used in the formulation of IMSIs in Jamaica. Under the Guidelines, the OUR is established as the IMSI administrator with functions which include the management of the IMSI resource and administration, assignment and reclamation of MNCs.

2.2.3 Provision 1.2 of the Guidelines states:

"1.2. These assignment guidelines pertain, in one section or another, to all segments of the IMSI – Mobile Country code (MCC), Mobile Network Code (MNC) and Mobile Station Identification Number (MSIN), in sequential order. The MCC is assigned by the ITU to member countries. The IMSI administrator participates in the management of all segments of the IMSI, but directly administers only the MNC segment. MNCs are assignable to operators of public networks offering public mobility services with international roaming capabilities. The MNC uniquely identifies the home network of a mobility service subscriber. The remaining segment of the IMSI, the Mobile Station Identification Number (MSIN), is directly administered by the network operator to which the MNC is assigned".

³ Office of Utilities Regulation. *Telecommunications Numbering Rules and Number Assignment Guidelines* Document No Tel 2020/TEL/008/RUL.001

- 2.2.4 Provision 3.3 of the Guidelines outlines the purposes for which the IMSI can be used:
 - "3.3. The IMSI enables mobile terminals/users to roam among public networks, domestically and internationally, by providing a uniform and unique home network and mobile terminal/user identification that is recognizable by all conforming public networks. When transmitted between visited and home networks, the IMSI enables the exchange of subscription and billing information for the visiting mobile station.

Specifically, the IMSI is used for:

- Determination of the mobile terminal's/user's home wireless network.
- Mobile terminal/user identification when information about a specific mobile terminal/user is to be exchanged between visited and home networks.
- Mobile station identification on the radio control path for registering a mobile station in a visited wireless network,
- Mobile station identification for signalling on the radio control path,
- Identification of the mobile terminal/user to allow for charging and billing of visiting mobile terminals/users, and
- Subscription management, i.e., retrieving, providing, changing, and updating subscription data for a specific".
- 2.2.5 Provisions 6.1 6.3 outline the criteria for MNC assignment. Specifically, 6.1 states:
 - "6.1 The MNC applicant must be, and certify that it is a public network operator offering public mobility services with international roaming for which an MNC is requested."
- 2.2.6 The Guidelines contemplate periodic review and modification by the OUR to meet changing and unforeseen circumstances, whether identified by the OUR or any other entity (see provision 12).

Chapter 3: Stakeholder Comments, the Office's Responses and Determinations

3.1 Introduction

3.1.1 The Office received responses to the Consultation Document from Digicel (Jamaica) Limited (Digicel)⁴ and the Consumer Advisory Committee on Utilities (CACU).⁵ Following this, the OUR allowed stakeholders a short period to comment on the responses received. However, no comments were received on the responses provided. In the responses received, stakeholders commented on the general sections of the Consultation Document as well as on specific provisions in the Guidelines. The Office has considered the general and specific comments made in relation to the consultation and now provides a summary of the stakeholders' comments, the OUR's responses, and subsequent determinations below.

3.2 Stakeholder's General Comments

Expansion of the Eligibility Criteria

- 3.2.1 In the Consultation Document, the OUR indicated that the purpose of the review of the IMSI Assignment Guidelines is to take account of the technological developments in the telecommunications sector and to ensure that the Guidelines are facilitative of increased broadband deployment. The OUR also indicated its intent to expand the eligibility criteria for the assignment of MNCs to allow for their assignment to entities other than mobile carriers. Given that technologies such as Fixed Wireless Access ("FWA") and satellite can provide an easier/cheaper solution to offer broadband connectivity to areas where telecommunications infrastructure is not present or is limited, the OUR was of the view that MNCs should be assigned to carriers utilising these technologies to provide telecommunications services.
- 3.2.2 The OUR acknowledged that there is a risk that MNCs assigned to fixed carriers who do not have an associated mobile operator could be used to provide mobile services for which the fixed carriers do not have a licence. The OUR is however of the view that the benefits associated with the use of mobile technologies in the provision of fixed broadband and voice services far outweigh the risk. The OUR further indicated that

⁴ Digicel (Jamaica) Limited. Digicel's Response to The Office of Utilities Regulation's Consultation Document on Review of the International Mobile subscriber Identity (IMSI) Assignment Guidelines. 2023 January 20

⁵ Consumer Advisory Committee on Utilities. *Review of the International Mobile Subscriber Identity (IMSI)*Assignment Guidelines. 2023 January 15.

where it is found that fixed wireless carriers are in breach of their licences, the OUR will initiate the enforcement proceedings outlined in the Act.

Stakeholders' Comments

- 3.2.3 Digicel stated that it noted the proposed expansion of eligibility criteria for the assignment of IMSIs in Jamaica to include networks that utilise fixed wireless access to provide "business and residential and broadband access services". The company reiterated concerns expressed in its 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 2019 August 30. In that document, Digicel indicated that assigning MNCs to fixed operators who do not have an associated mobile arm created the risk of those operators bypassing the licensing regime for mobile carriers. The company indicated that it is pleased that the OUR has taken note of its concern and welcomed the OUR's statement that it will initiate the enforcement proceedings under the Act where it finds that fixed carriers are operating in breach of their licence. The company is, however, of the view that the OUR should consider measures and safeguards that can be put in place to ensure prevention and/or early detection of a breach.
- 3.2.4 Digicel also highlighted the OUR's statement that there are various technical approaches that can be utilised to ensure fixed wireless services remain fixed and suggested that the OUR, in its review of MNC applications from fixed wireless providers, should ensure that these applicants have such arrangements in place.
- 3.2.5 CACU agreed with the OUR's proposal to extend the eligibility criteria to include FWA operators noting that there is a basis for the proposal as it would include fixed wireless satellite operators that have been issued licences. CACU, however, shares Digicel's view that the OUR should establish measures to ensure that FWA operators do not operate outside of their remit by providing mobile services. The entity suggested that one such measure could involve collaboration with the Spectrum Management Authority ("SMA").

The Office's Response

3.2.6 The Office notes that the stakeholders have not objected to the extension of the eligibility criteria for the assignment of MNCs. The Office notes however, the concerns regarding the assignment of MNCs to fixed operators that do not have an accompanying mobile arm. The OUR maintains the view that the proposed change is necessary given the benefits associated with the use of mobile technologies in the provision of fixed broadband and voice services. Notwithstanding, the OUR has accepted CACU's

recommendation that the OUR collaborate with SMA to establish measures aimed at ensuring that Licensees do not operate outside of their licensed activities. In this regard, the OUR will coordinate with the SMA to establish monitoring protocols that will facilitate the detection of fixed wireless Licensees who are operating beyond their service boundaries.

3.3 Stakeholders' Comments on Specific Provisions of the Guidelines

3.3.1 Section 5.2 of the Consultation Document outlined the proposed amendments to the respective provisions of the IMSI Assignment Guidelines to make them applicable to fixed wireless networks, as well as new provisions aimed at clarifying some of the procedural arrangements in the Guidelines. The amendments to the IMSI Guidelines will also necessitate amendments to some of the forms located in the section *Mobile Network Code Application and Related Forms Package* of the revised Guidelines.

Section 1.0: Purpose and Scope

3.3.2 The Consultation Document set out proposed amendments to provisions 1.1, 1.2, 1.3, and 1.5 as set out in the table below:

Existing Provisions	Proposed Amendments
1.1	1.1
The IMSI was created and formatted to provide the unique international identification of mobile terminals and mobile users and to enable these terminals and users to roam among public networks which offer public mobility services.	This document contains procedures for the assignment and use of IMSIs by Mobile Carriers and Fixed Wireless Carriers in Jamaica. The IMSI was created and formatted to provide the unique identification of a wireless subscription and to enable those subscriptions to access telecommunications services on public networks.
1.2	1.2
These assignment guidelines pertain, in one section or another, to all segments of the IMSI – Mobile Country code (MCC), Mobile Network Code (MNC) and	These assignment guidelines pertain, in one section or another, to all segments of the IMSI – Mobile Country Code (MCC), Mobile Network Code (MNC) and

Existing Provisions

Mobile Station Identification Number (MSIN), in sequential order. The MCC is assigned by the ITU to member countries. The IMSI administrator participates in the management of all segments of the IMSI, but directly administers only the MNC segment. MNCs are assignable to operators of public networks offering mobility services public with international roaming capabilities. The MNC uniquely identifies the home network of a mobility service subscriber. The remaining segment of the IMSI, the Mobile Station Identification Number (MSIN), is directly administered by the network operator to which the MNC is assigned.

Proposed Amendments

Subscription Identification Mobile Number (MSIN), in sequential order. The MCC is assigned by the ITU to member IMSI countries. The administrator participates in the management of all segments of the IMSI, but directly administers only the MNC segment. MNCs are assignable to operators of mobile networks and fixed wireless networks requiring an IMSI for generally accepted functions such as end-user authentication and signalling. The MNC also uniquely identifies the home network of a wireless subscription. The remaining segment of the IMSI, the Mobile Subscription Identification Number (MSIN), is directly administered by the network operator to which the MNC is assigned.

1.3

These guidelines were developed for consensus approval of representatives of entities within the telecommunications sector of Jamaica.

1.3

To be deleted.

Existing Provisions	Proposed Amendments
1.5	1.5
These guidelines are based on the content of International Telecommunication Union – Telecommunications' (ITU-T) Recommendation E.212, The International Identification Plan For Mobile Terminals and Mobile Users. This Recommendation was revised in 1998. The content of this document is in conformance with that iteration of the Recommendation.	of International Telecommunication Union – Telecommunications Standardization Sector' (ITU-T) Recommendation E.212: The

3.3.3 Stakeholders did not provide any feedback on the Section 1.0 provisions.

The Office's Response

3.3.4 Subsequent to the publication of the OUR's consultation document, a further updated version of the Recommendation ITU-T E.212 document was issued that addresses the subject matter. These Assignment Guidelines are therefore based on the updated version, that is Recommendation ITU-T E.212 (06/2024), in order to be consistent with current best practices. The updated does not impact the modifications that were the subject of the consultation.

Determination #1 – Section 1.0: Purpose and Scope

The Office will replace provisions 1.1, 1.2, 1.3, and 1.5 in Section 1.0 of the IMSI Assignment Guidelines with the provisions set out as "Proposed Amendments" as presented in the Consultation Document and as reflected in the second column of the table in paragraph table in 3.3.2 above, and as further amended in paragraph 3.3.4 above (in relation to provision 1.5 of the Guidelines).

Section 2.0: References

3.3.5 The Consultation Document set out proposed amendments to provisions 2.0 and 2.1 as set out in the table below:

Existing Provisions	Proposed Amendments
2.0	2.0
REFERENCES	DEFINITIONS
	[The definitions in the Glossary of the current Guidelines will be relocated to this section in the revised version]
2.1 ITU-T Recommendation E.212, The International Identification Plan For Mobile Terminals and Mobile users.	2.1 Recommendation ITU-T E.212 (06/2024): The International Identification Plan for Public Networks and Subscriptions.

Stakeholders' Comments

3.3.6 Stakeholders did not provide any feedback on the Section 2.0 provisions.

The Office's Response

- 3.3.7 In light of the relocation of the defined terms in the Glossary section of the Guidelines to section 2, the heading of this section "References" will be replaced with "Definitions".
- 3.3.8 Additionally, the content of provision 2.1 as amended would be better reflected as a definition of the term "Recommendation E.212", and therefore it will be removed as a discreet provision and included in the list of defined terms to be set out in the revised section 2 of the Guidelines. In light of the indication that the Guidelines will be based on the most recommendation issued by the ITU, this definition will be revised to read as follows: Recommendation ITU-T E.212 (06/2024): The international identification plan for public networks and subscriptions.

Determination #2 – Section 2.0: References

The Office will rename section 2.0 with the title - "Definitions" - and include the definitions in the Glossary section of the IMSI Assignment Guidelines, as may be amended, in this section.

Also, the text of provision 2.1 in Section 2.0 of the IMSI Assignment Guidelines will be replaced with the text set out in paragraph 3.3.8 above, and the revised text will be included among the list of defined terms to be placed in the revised section 2 of the Guidelines.

Section 3.0: IMSI Format and Function

3.3.9 The Consultation Document set out proposed amendments to provisions 3.2, 3.3, 3.6, 3.7, and 3.8 as set out in the table below:

Existing Provisions	Proposed Amendments
3.2 Each IMSI uniquely identifies the mobile terminal/user, the home network of the mobile terminal/user, and the home country of the network and of the mobile terminal/user.	3.2 Each IMSI identifies a unique wireless subscription, the home network of that wireless subscription, and the home country of that network. In the case of mobile subscriptions, the IMSI uniquely identifies the mobile terminal/user, the home network of the mobile terminal/user, and the home country of the network and of the mobile terminal/user.
3.3 The IMSI enables mobile terminals/users to roam among public networks, domestically and internationally, by providing a uniform and unique home network and mobile terminal/user identification that is recognizable by all conforming public networks. When transmitted between	3.3 Wireless Networks use IMSIs to enable: a. determination of a wireless subscription's home network, b. wireless subscription identification when information about a wireless subscription is

Existing Provisions	Proposed Amendments
visited and home networks, the IMSI enables the exchange of subscription and billing information for the visiting mobile station. Specifically, the IMSI is used for: Determination of the mobile terminal's/user's home wireless network, Mobile terminal/user identification when information about a specific mobile terminal/user is to be exchanged between visited and home networks, Mobile station identification on the radio control path for registering a mobile station in a visited wireless network, Mobile station identification for signalling on the radio control path, Identification of the mobile terminal/user to allow for charging and billing of visiting mobile terminals/users, and Subscription management, i.e., retrieving, providing, changing, and updating subscription data for a specific	to be exchanged between visited and home networks, including the subscription and billing information needed to enable charging of visiting wireless subscriptions, c. wireless subscription identification on the radio contropath for registering a wireless subscription on a visited wireless network, d. wireless subscription identification for signalling on the radio control path, and e. subscription management, i.e. retrieving, providing, changing and updating subscription data for a specific wireless subscription.
3.6 The function of the MCC is to identify the	3.6 The function of the MCC is to identif

terminal/user. By analysing the MCC, a subscription. Some MCCs are used to visited network can determine the country identify international operators, e.g.,

Existing Provisions	Proposed Amendments
from which the mobile terminal/user originated and in which its home network resides.	satellite systems providing service to aircraft, maritime or land-based wireless subscriptions across or between multiple countries. By analysing the MCC, a foreign visited network can determine the country or international operator from which the wireless subscription originated and in which its home network resides.
The function of the MNC is to identify the home network, within the country associated with the MCC, of the visiting mobile terminal/user. The visited network uses the MCC-MNC combination to identify and query the home network of the visiting mobile terminal/user that is requesting service. MNCs in Jamaica are three digits in length and in the format XXX, where X equals any of the decimal digits 0-9. The 3-digit maximum is necessary so that, when combined with the 3-digit MCC, the visited network need not analyze more than 6 digits to determine the home network of the visiting mobile terminal/user— another Recommendation E.212 requirement. This format provides a mathematical potential of one thousand MNCs (000-999) for each MCC.	The function of the MNC is to identify the home network of a wireless subscription within the country associated with the MCC. A visited mobile network uses the MCC-MNC combination to identify and query the home network of the visiting wireless subscription that is requesting service. MNCs in Jamaica are three digits in length and in the format XXX, where X equals any of the decimal digits 0-9. The 3-digit maximum is necessary so that, when the MNC is combined with the 3-digit MCC, a visited network need not analyse more than 6 digits to determine the home network of the visiting wireless subscription — another Recommendation E.212 requirement. This format provides a mathematical potential of one thousand MNCs (000-999) for each MCC.
3.8	3.8

Existing Provisions	Proposed Amendments
The function of the MSIN is to uniquely identify a mobile terminal/user within its home network.	The function of the MSIN is to identify a wireless subscription within its home network.
MSINs in Jamaica are nine digits in length and in the format XXXXXXXXX, where X equals any of the decimal digits 0-9. Recommendation E.212 limits IMSI length to a fifteen-digit maximum. Since the Jamaican IMSI format includes a six-digit MCC+MNC, a nine-digit MSIN is the maximum allowable. The nine-digit format provides one billion MSINs per MNC or network, if no other function than mobile terminal/user identification is embedded in the MSIN.	MSINs in Jamaica are nine digits in length and in the format XXXXXXXXXX, where X equals any of the decimal digits 0-9. Recommendation E.212 limits IMSI length to a fifteen-digit maximum. Since the Jamaican IMSI format includes a six-digit MCC+MNC, a nine-digit MSIN is the maximum allowable. The nine-digit format provides one billion MSINs per MNC or network, if no other function than wireless subscription identification is embedded in the MSIN.

3.3.10 Stakeholders did not provide any feedback on the Section 3.0 provisions.

The Office's Response

3.3.11 In setting out the text of provision 3.6 of the Guidelines in the Consultation Document, a portion of the provision, specifically the last three sentences in that paragraph, which identifies the length of the MCC and the MCC that the ITU has assigned to Jamaica, was inadvertently omitted. The omitted sentences were:

According to Recommendation E.212, an MCC is three digits in length and is in the format NXX, where N equals any of the decimal digits 2-9, and X equals any of the decimal digits 0-9. MCCs are assigned by the ITU in response to formal requests from recognized national administrations of ITU-member countries. The MCC currently assigned to Jamaica is "338".

It was not the intention of the OUR to exclude this information from the Guidelines and therefore the excluded sentences will be included, unamended, in the revised provision 3.6 as follows:

The function of the MCC is to identify the domiciliary country of a wireless subscription. Some MCCs are used to identify international operators, e.g., satellite systems providing service to aircraft, maritime or land-based wireless subscriptions across or between multiple countries. By analysing the MCC, a foreign visited network can determine the country or international operator from which the wireless subscription originated and in which its home network resides.

According to Recommendation E.212, an MCC is three digits in length and is in the format NXX, where N equals any of the decimal digits 2-9, and X equals any of the decimal digits 0-9. MCCs are assigned by the ITU in response to formal requests from recognized national administrations of ITU-member countries. The MCC currently assigned to Jamaica is "338".

Determination #3 – Section 3.0: IMSI Format and Function

The Office will replace provisions 3.2, 3.3, 3.6, 3.7, and 3.8 in Section 3.0 of the IMSI Assignment Guidelines with the provisions set out as "Proposed Amendments" as presented in the Consultation Document, and as reflected in the second column of the table in paragraph 3.3.9 above, and as further amended in paragraph 3.3.11 above (in relation to provision 3.6 of the Guidelines).

Section 4: Assumptions and Constraints

3.3.12 The Consultation Document set out proposed amendments to provision 4.1 as set out in the table below:

Existing Provisions	Proposed Amendments
4.1	4.1
provide the greatest latitude to those	l '

3.3.13 Stakeholders did not provide any feedback on the Section 4 provision.

Determination #4 - Section 4: Assumptions and Constraints

The Office will replace provision 4.1 in Section 4 of the IMSI Assignment Guidelines with the provision set out as "Proposed Amendments" as presented in the Consultation Document, and as reflected in the second column of the table in paragraph 3.3.12 above.

Section 5: Assignment Principles

3.3.14 The Consultation Document set out proposed amendments to provisions 5, 5.1, 5.2, 5.3, 5.4, 5.7, 5.12, and 5.14 as set out in the table below:

Existing Provisions	Proposed Amendments
<u>5</u>	<u>5</u>
below allow network operators the	The assignment principles defined below will apply to the assignment of MNCs by the Office and the use of IMSIs by assignees:

Existing Provisions	Proposed Amendments
<u>5.1</u>	5.1
MNCs are to be assigned and used only by public networks offering mobility services with international roaming capability (Section 1.1).	MNCs are to be assigned to and used only by mobile carriers and fixed wireless carriers that require an MNC to provide telecommunications services to the public.
5.2	5.2
Upon application, the Office will assign one MNC for each valid network operator. Nothing shall preclude a network operator, however, from aggregating multiple or merged networks/licenses within a single MNC.	Having determined the validity of an application, the Office will assign an MNC to the Applicant. Separate MCC+MCC resources will be assigned for use in mobile and fixed networks where appropriate. Nothing shall preclude a network operator, however, from aggregating multiple or merged networks/licences within a single MNC.
5.3	<u>5.3</u>
The 6-digit MCC+MNC, as part of the 15-digit IMSI, is to be assigned so as to uniquely identify the home network of the mobility service user worldwide.	The 6-digit MCC+MNC, as part of the 15-digit IMSI, is to be assigned so as to uniquely identify the home network associated with a wireless subscription worldwide.
<u>5.4</u>	5.4
MSINs are assigned by network operators to their subscribed mobile terminals/users. An IMSI is unique to a single mobile terminal/user, but a mobile terminal/user may have multiple IMSIs.	MSINs are assigned by MNC Assignees to wireless subscriptions. In principle, only one IMSI should be assigned to each subscription, although multiple subscriptions may be associated with a SIM/USIM/UICC/embedded SIM card.
<u>5.7</u>	<u>5.7</u>
Should an assignee transfer control of a wireless license, then the use of the assigned MNC is transferable to the new licence owner.	Should an assignee transfer control of a wireless licence to another operator, then the use of the assigned MNC is transferable to that operator with notification to the Office by the filing of Form D – Request for Change in Mobile Network Code (MNC) Assignment Information.

Existing Provisions	Proposed Amendments
5.12	<u>5.12</u>
These guidelines have no effect on MNC assignments made prior to their approval. Use of all assigned resources shall be consistent with these guidelines.	These guidelines have no effect on MNC assignments made prior to [EFFECTIVE DATE OF GUIDELINES TO BE INSERTED]. Use of all assigned resources shall be consistent with these guidelines.
5.14	5.14
As required, applicants for MNCs must comply with all applicable local regulations relative to the provisioning of mobility service with international roaming capability.	Applicants for MNCs must ensure that they comply with all applicable Jamaican regulatory requirements for the provisioning of services applicable to their category (i.e., Mobile Carriers and Fixed Wireless Carriers).

- 3.3.15 Digicel indicated that it supports the OUR's proposed amendment to 5.12 which will ensure that the revised Guidelines will not have any impact on the MNC assignments done prior to the effective date of the Guidelines.
- 3.3.16 CACU stated that the Guidelines should not accommodate a transfer from one operator/owner to another as outlined in provision 5.7. The entity is of the view MNCs should be returned to the OUR as provided for in provision 7.3.6 and then assigned to the new operator/owner. CACU stated this will ensure better control of assigned MNCs.

The Office's Response

3.3.17 The Office acknowledges Digicel's comment as the intention is not for the amendments to have retroactive effect on existing MNC assignments. On further review however, it was noted that, without further modification, the revised provision 5.12 may have the unintended result of excluding all MNC assignments in existence as at the effective date of the revised Guidelines to no longer be subject to the IMSI Assignment Guidelines. As the amendments to the Guidelines will effectively expand the services for which MNC resources may be assigned, and have not otherwise modified the provisions in so far as

they would affect existing MNC assignments for mobile services, the OUR will amend provision 5.12 as proposed in the Consultation Document, except that the date to be inserted will reflect the original effective date of the Guidelines, that is 2007 January 31, and not the effective date of the amended guidelines.

- 3.3.18 The Office notes CACU's objection to MNCs being transferable. The Office is however of the view that the transferability of MNCs is necessary to avoid a disruption of the provision of wireless services to customers in cases where their service provider is in the process of assigning its licence or transferring control of its operations to another licensed entity. If the Office were to implement CACU's suggestion, this would mean that the existing service provider would have to halt the provision of services upon submission of Form F Mobile Network Code Assignment Return. The Licensee to whom the licence is being assigned or the operations being transferred, would then have to await the processing of its MNC application before it could start providing service. Given the Office's mandate to facilitate the provision of reliable service to customers, it is essential that the option to transfer MNCs is retained.
- 3.3.19 It should also be noted that the subsequent use of the MNC by the recipient of the transfer must accord with the principles established within the Numbering Rules and the IMSI Assignment Guidelines. Where there is a deviation from those principles, the OUR is empowered to reclaim the code.
- 3.3.20 For clarity however, the OUR will further modify provision 5.7 to reflect the types of assignment and transfer contemplated by the Act, and require that any such assignment or transfer of control must be done in accordance with the provisions of section 17(2) of the Act. The provision will be modified as follows:

Should an MNC Assignee assign its wireless licence or transfer control of its operations to another Licensee pursuant to section 17(2) of the Telecommunications Act, then the use of the assigned MNC is transferable to that Licensee with notification to the Office by the filing of Form D – Request for Change in Mobile Network Code (MNC) Assignment Information.

Determination #5 – Section 5: Assignment Principles

The Office will replace provisions 5, 5.1, 5.2, 5.3, 5.4, 5.7, 5.12, and 5.14 in Section 5 of the IMSI Assignment Guidelines with the provisions set out as "Proposed Amendments" as presented in the Consultation Document, and as reflected in the second column of the table in paragraph 3.3.14 above, and as further amended in paragraphs 3.3.17 and 3.3.20 above (in relation to provision 5.7 of the Guidelines).

Section 6: Criteria for MNC Assignment

3.3.21 The Consultation Document set out proposed amendments to provisions 6.1, 6.2, and 6.3 as set out in the table below:

Existing Provisions	Proposed Amendments
6.1 The MNC applicant must be, and certify that it is a public network operator offering public mobility services with international roaming for which an MNC is requested.	6.1 An MNC Applicant must demonstrate eligibility by way of an attestation in accordance with one of the following criteria: a) A Mobile Carrier licensed under the Telecommunications Act;
	b) A Fixed Wireless Carrier licensed under the Telecommunications Act.
6.2 The applicant/assignee of an MNC must have and provide evidence of authorization, from the Ministry of Industry, Investment and Commerce to operate in Jamaica to provide mobility services with international roaming capability.	At least one of the radio protocols to be used by the Applicant must be from the following list of protocols known to require an IMSI for identification and signalling: a) GSM-based protocols including General Packet Radio Service (GPRS), Enhanced Data for GSM Evolution (EDGE), Wideband CDMA (W CDMA), and High Speed Packet Access (HSPA);

Existing Provisions	Proposed Amendments
	b) CDMA2000 protocols including CDMA2000 1X (a 3GPP2 cellular technology providing voice and data services) and High Rate Packet Data (HRPD [EVDO]);
	c) Long Term Evolution (LTE) protocols including LTE Advanced.
	d) 5G New Radio (NR); or
	e) such other protocol as identified by the OUR and notified to the public.
6.3	6.3
An MNC will only be assigned by the Office upon receipt and approval of a completed Form A – Home Network Identity (MNC) Application.	An MNC will only be assigned by the Office upon receipt and approval of a completed Form A – Mobile Network Code (MNC) Application.

3.3.22 CACU indicated that the existing provision 6.2 should be retained in some form and if not, the Office should state why.

The Office's Response

- 3.3.23 The Office notes CACU's comment in relation to the retention of the existing provision 6.2. However, the current provision 6.2 is obsolete as there is no authorization from the Ministry of Industry, Investment and Commerce currently required to provide the services contemplated by the Guidelines. A licence issued by the Minister with responsibility for telecommunications (currently the Minister of Science, Energy, Telecommunications and Transport) pursuant to the Telecommunications Act, is required. This requirement is adequately addressed in the proposed revised provision 6.1.
- 3.3.24 The proposed provision 6.2 further refines the eligibility for assignment criteria. By requiring that an MNC Applicant's network utilise at least one of the radio interface

protocols listed, the new provision will ensure that MNCs are only assigned to those Licensees whose networks require the use of IMSIs for signalling or end-user authentication.

Determination #6 - Section 6: Criteria for MNC Assignment

The Office will replace provisions 6.1, 6.2, and 6.3 in Section 6 of the IMSI Assignment Guidelines with the provisions set out as "Proposed Amendments" as presented in the Consultation Document, and as reflected in the second column of the table in paragraph 3.3.21 above.

Section 7: Responsibilities of MNC Applicants and Assignees

The Consultation Document set out proposed amendments to provisions 7.3.1, 7.3.2, 3.3.25 and 7.3.6, and proposed a new provision 7.4 as set out in the table below:

Existing Provisions	Proposed Amendments
7.3.1 Assign and efficiently manage the MSINs (last nine digits of the IMSI) associated with the assigned MNC. Maintain up-to-date and accurate assignment records that match MSINs to mobile terminals/users. These records may be required for audit purposes (Section 10).	7.3.1 Assign and efficiently manage the MSINs (last nine digits of the IMSI) associated with the assigned MNC and maintain upto-date and accurate MSIN assignment records. These records may be required for audit purposes.
7.3.2	7.3.2
Inform the Office of changes in the information associated with an MNC assignment by using Form D – Request for Change in Mobile Network Code (MNC) - Assignment Information. Changes may occur because of the transfer of an MNC, through merger or acquisition, to a different network (Section 5.7). The initial assignee of the MNC involved in a transfer occurring through merger, acquisition or other	Inform the Office of changes in the information associated with an MNC assignment, including their contact details (telephone number and email and company address), by using Form D – Request for Change in Mobile Network Code (MNC) Assignment Information. Changes may occur because of the transfer of an MNC, through merger or acquisition, to a different network (Section 5.7). The initial assignee of the MNC involved in a transfer

Existing Provisions	Proposed Amendments
means must immediately inform the Office when such a change becomes effective. Timely submission of change information enables the Office to maintain accurate MNC assignment records.	occurring through merger, acquisition or other means must immediately inform the Office when such a change becomes effective. In addition, the company acquiring the IMSI must immediately inform the Office using Form D – Request for Change in Mobile Network Code (MNC) Assignment Information. Timely submission of change information is required to enable the Office to maintain accurate MNC assignment records.
7.3.6	7.3.6
Return to the Office, using Form F – Mobile Network Code (MNC) Assignment Return:	Return to the Office, using Form F – Mobile Network Code (MNC) Assignment Return:
Any MNC no longer needed for the provision of mobility services with international roaming capability,	a. Any MNC no longer required for the provision of the telecommunications services for which it was sought,
 Any MNC not deployed within the time period specified, including extensions (Section 5.10), or 	b. Any MNC not deployed within the time period specified, including extensions, or
Any MNC not used in conformance with these assignment guidelines.	c. Any MNC not used in conformance with these assignment guidelines.
	New Provision
	<u>7.4</u>
	All forms referenced herein must be signed and submitted by an MNC Applicant's or MNC Assignee's Authorized Representative for making resource requests. This serves as a control measure for the protection of the MNC Applicant, MNC Assignee and the Office. The MNC Applicant or MNC Assignee may designate its Authorized Representatives

Existing Provisions	Proposed Amendments
	for multiple types of numbering resources in a single letter to the Office.

3.3.26 Stakeholders did not provide any feedback on the section 7 provisions.

The Office's Response

3.3.27 By inadvertent omission, a modification to provision 7.2 was not proposed in the Consultation Document where the reference to "Form A – Home Network Identity (MNC) Application" should have been recommended to be replaced with "Form A – Mobile Network Code (MNC) Application". The former reference to the title of Form A is an error in the Guidelines as the actual form in the Guidelines is named "Mobile Network Code (MNC) Application". A similar modification was proposed to provision 6.3 in the Consultation Document for which no comments were received. Additionally, provision 7.2 makes references to the Forms being included in an "Attachment 2 to the guidelines". There is no such attachment or section with this heading. It is therefore proposed that this reference be removed. So as to correct the reference errors and ensure consistency in the description of the Forms throughout the Guidelines, provision 7.2 will be revised to read:

Applicants must apply in writing to the Office by completing Form A – Mobile Network Code (MNC) Application. Copies of all required forms are included in the Mobile Network Code Application and Related Forms Package in these Guidelines.

3.3.28 In the proposed amendment to provision 7.3.6 included in the Consultation Document, there was an error in the title of Form F referenced in the provision, where "Form F - Mobile Network Code Return" should have read "Form F - Mobile Network Code (MNC) Assignment Return". In order to correct this error and ensure consistency in the description of the Forms throughout the Guidelines, provision 7.3.6 will be revised to read:

Return to the Office, using Form F – Mobile Network Code (MNC) Assignment Return:

a. Any MNC no longer required for the provision of the telecommunications services for which it was sought,

- b. Any MNC not deployed within the time period specified, including extensions, or
- c. Any MNC not used in conformance with these assignment guidelines.

Determination #7 – Section 7: Responsibilities of MNC Applicants and Assignees

The Office will replace provisions 7.2, 7.3.1, 7.3.2, and 7.3.6, and add new provision 7.4 in Section 7 of the IMSI Assignment Guidelines with the provisions set out as "Proposed Amendments" as presented in the Consultation Document, and as reflected in the second column of the table in paragraph 3.3.25 above, and as amended or further amended, as the case may be, in paragraph 3.3.27 and 3.3.28 above.

Section 8: Responsibilities of the Office

3.3.29 The Consultation Document set out proposed amendments to provisions 8.2, 8.4.4, 8.6, 8.7, and 8.10 and proposed a new provision 8.11 as set out in the table below:

Existing Provisions	Proposed Amendments
8.2	8.2
Provide copies of these guidelines and forms to MNC applicants and assignees, and assist them in completing the required forms.	Provide these guidelines and forms to MNC Applicants and MNC Assignees, and respond to reasonable questions pertaining to any aspect of the IMSI process, forms, instructions, etc. from an MNC Applicant or an MNC Assignee. The IMSI Administrator is not responsible for completing forms for, or training the staff of, MNC Applicants and MNC Assignees.

Existing Provisions	Proposed Amendments
8.4.4	8.4.4
When reassigning an MNC that has been returned or reclaimed, the Office will ensure that the MNC has remained dormant for the required period (Section 5.13).	When assigning an MNC that has been returned or reclaimed, the Office will ensure that the MNC has remained dormant for the required period (Section 5.13).
8.6	8.6
Publish, at least monthly, via the agreed medium, a list of assigned MNCs. The list will include the MNC number, the MNC assignee, and the entity contact and number. Track the number of IMSIs assigned and the assignment rate.	Publish and maintain on the Office's website (www.our.org), a list of assigned MNCs. The list will include the MNC number, the MNC Assignee, and the Assignee's contact information. Track the number of the number of MNCs assigned, recovered and available for assignment.
8.7	8.7
Investigate any MNC that has not been deployed within the required time frame, and issue extensions if appropriate (Section 5.10). Notify the appropriate industry forum if an assignee fails to deploy an assigned MNC within two extensions.	Investigate any MNC where the MNC Assignee has not submitted a Form C – Mobile Network Code (MNC) Deployment within 12 months of assignment. Where the Office finds that the MNC has not been deployed, it will initiate the reclamation procedure outlined in these assignment guidelines.
8.10	8.10
Inform the Jamaican telecommunications industry, via the agreed method, of any revisions to these guidelines (Section 12).	Inform the Jamaican telecommunications industry of any revisions to these guidelines via an Industry Notification and publication of the revised guidelines on its website.
-	New provision
	8.11
	Notify the appropriate industry forum when an MNC is issued, returned, or reclaimed.

3.3.30 CACU pointed out a typographical error of repeated words (i.e. "the number of") in the proposed amendment to provision 8.6.

The Office's Response

3.3.31 The Office acknowledges CACU's comment and will amend provision 8.6 to remove the repeated words as follows:

Publish and maintain on the Office's website (www.our.org), a list of assigned MNCs. The list will include the MNC number, the MNC Assignee, and the Assignee's contact information. Track the number of MNCs assigned, recovered and available for assignment.

3.3.32 It is noted, upon further examination of the proposed amendment to provision 8.7, that it failed to give adequate recognition of the power of the Office under the Guidelines to extend the time for deployment beyond the referenced 12-month period, which acknowledgement is in the current version of the provision. In fact, provision 5.10, permits the OUR to grant an extension of time for up to four periods of 90 days each, in certain circumstances. In order to avoid any ambiguity or potential for conflict between the contents of provisions 5.10 and 8.7, the OUR deems it prudent to indicate in the amended provision 8.7, that the Office will initiate the reclamation procedure where an assignee fails to deploy within 12 months of the assignment, or fails to deploy within such other extension of time as may be granted pursuant to the Guidelines. In light of this, provision 8.7 will be amended to read:

Investigate any MNC where the MNC Assignee has not submitted a Form C – Mobile Network Code (MNC) Deployment within 12 months of the assignment, or, if applicable, within such extension of time for deployment of the assigned MNCs as may be granted by the Office in accordance with these guidelines. Where the Office finds that the MNC has not been deployed as required, it will initiate the reclamation procedure outlined in these assignment guidelines.

3.3.33 Upon further review of the Guidelines, it was also discovered that provision 8.9 contained several typographical and grammatical errors that were not previously observed and addressed in the Consultation Document. For good order and accuracy, these errors will be corrected as set out in the second column "Proposed Amendments" in the table below.

It is our view that a consultation on this proposed change is not necessary as these changes will not affect the substance of the original provision.

Existing Provisions	Proposed Amendments
8.9	8.9
Direct The IMSI conservation programme and conduct period audits, as required, of MNC assignee records (Cection 10).	Direct the IMSI conservation programme and conduct periodic audits, as required, of MNC assignee records (Section 10).

Determination #8 - Section 8: Responsibilities of the Office

The Office will replace provisions 8.2, 8.4.4, 8.6, 8.7, 8.9, and 8.10, and add new provision 8.11 in Section 8 of the IMSI Assignment Guidelines with the provisions set out as "Proposed Amendments" as presented in the Consultation Document, and as reflected in the second column of the tables in paragraphs 3.3.29 and 3.3.33 above, and as further amended, as the case may be, in paragraphs 3.3.31 and 3.3.32 above.

Section 10: IMSI Resource Conservation and Assignment Audits

3.3.34 The Consultation Document set out a proposed amendment to provision 10.4.3 as set out in the table below:

Existing Provisions	Proposed Amendments
10.4.3	10.4.3
The Office will expect to review the following information to ensure conformance with these guidelines and the proper use of the IMSI resource:	The Office will expect to review the following information to ensure conformance with these guidelines and the proper use of the IMSI resource:
Verification that not more than one MNC is assigned per network or wireless license	a. Verification that not more than one MNC is assigned per network or wireless licence,

b. Verification of assignment for eac
b. Verification of assignment for eac working MSIN,
c. Date of assignment of eac working MSIN,
d. Activation date of each working MSIN,
e. Indication of MSIN assignment to end users, and
f. Status and status date of each MSIN unavailable for assignment i.e., MSINs assigned for testing reserved, aging, pending and/or suspended.

3.3.35 Stakeholders did not provide any feedback on the section 10 provisions.

Determination #9 – Section 10: IMSI Resource Conservation and Assignment Audits

The Office will replace provision 10.4.3 in Section 10 of the IMSI Assignment Guidelines with the provision set out as "Proposed Amendments" as presented in the Consultation Document, and as reflected in the second column of the table in paragraph 3.3.34 above.

Section 14: Glossary

3.3.36 The Consultation Document proposed that the definitions in the Glossary section of the Guidelines be relocated to section 2.0 – References, which section should be relabelled "Definitions", and that the following definitions be amended, and new definitions added, as set out in the table below:

Existing Definitions	Proposed Amendments
-	Fixed Wireless Carrier - In the context of the IMSI Assignment Guidelines, Fixed Wireless Carrier means an entity that is licensed pursuant to the Telecommunications Act to operate a fixed network as well as provide fixed telecommunications services to the public and who intends to use a radio protocol that requires an MNC (e.g., satellite operators with ancillary terrestrial communications networks, point-to-point (fixed) radio network operators, and point-to-multipoint (fixed) radio network operators). Fixed Wireless Network - In the context of the IMSI Assignment Guidelines, Fixed Wireless Network means a network that utilises radio links between two fixed points to provide specified services. The services provided over such networks should not permit a user to move continuously between places during the provision of a single call or data session. For the purpose of these Guidelines, satellite-based networks are included.
Home network – The network of the service provider to which a given mobile subscriber is subscribed.	Home Network – The network responsible for the subscription identified by the elements within the IMSI.
International Mobile Subscriber Identity (IMSI) – The string of decimal digits, up to a maximum of 15 digits, that identifies a unique mobile terminal or mobile subscriber internationally. The IMSI consists of three fields; the Mobile Country Code (MCC), the Mobile Network Code (MNC), and the Mobile Station Identification Number (MSIN).	International Mobile Subscription Identity (IMSI) – The string of decimal digits, up to a maximum of 15 digits, that identifies a unique wireless subscription internationally. The IMSI consists of three fields: the Mobile Country Code (MCC), the Mobile Network Code (MNC), and the Mobile Subscription Identification Number (MSIN).

Existing Definitions	Proposed Amendments
-	MNC Applicant – An entity who applies for an MNC.
MNC assignee - The entity to which an MNC has been assigned for the provision of public mobility services with international roaming capability.	MNC Assignee – The entity to which an MNC has been assigned.
-	Mobile Carrier – In the context of the IMSI Assignment Guidelines, Mobile Carrier means an entity that is licensed pursuant to the Telecommunications Act to operate a mobile network as well as provide mobile telecommunications services to the public (e.g., cellular operators, Personal Communications Services (PCS) operators, Enhanced Specialized Mobile Radio (ESMR) operators, and Mobile Satellite operators using licensed mobile spectrum).
Mobile Country Code (MCC) – The first field of the IMSI that is 3 digits in length. An MCC either identifies a country or a group of Networks that share an MCC for international services.	Mobile Country Code (MCC) - The first field of the IMSI that is 3 digits in length, and which identifies the domiciliary country or international operator for a wireless subscription. By analysing the MCC, a visited foreign network can determine the home country where the wireless subscription originated.
-	Mobile Network – as defined in the Telecommunications Act.
Mobile Network Code - The second field of the IMSI that is 2 or 3 digits in length, The MNC, in combination with the MCC, uniquely identifies the home network of the mobile terminal or mobile user.	Mobile Network Code (MNC) - The second field of the IMSI that is 2 or 3 digits in length (3 in North America), and which identifies the home network, within the country associated with the MCC, of a visiting wireless subscription. The visited network uses the MCC-MNC combination to identify the home network of the

Existing Definitions	Proposed Amendments
	visiting wireless subscription that is requesting service.
Mobile Subscriber Identification Number (MSIN) – The third field of the IMSI that is a maximum of 10 digits. The MSIN within a given MCC+MNC identifies a unique mobile terminal or mobile subscriber within a public network.	Mobile Subscription Identification Number (MSIN) – The third field of the IMSI, a 9-digit number (a maximum of 10 digits if the MNC is 2-digits) which is administered by the relevant operator to uniquely identify individual subscriptions.
	Wireless Subscription – A mobile or a fixed wireless subscription.

3.3.37 Stakeholders did not provide any feedback on the definitions outlined in the Consultation Document.

The Office's Response

- 3.3.38 Given the introduction of the term "Authorized Representative" in the proposed new provision 7.4, it is deemed prudent to include a definition of this term that aligns with the content of the new provision. It was also noted that, with the proposed amendments to the Guidelines, the term "Mobile Subscriber" no longer appears in the Guidelines and therefore, should be deleted from the list of defined terms. Finally, upon further examination of the Guidelines, it was noted that the acronym "NMSI" is used in provision 3.9 but has not been defined. For completeness, a definition of the acronym's expanded term will be included in the list of defined terms.
- 3.3.39 The OUR has noted the ITU's use of the term "subscription" rather than "subscriber" in its description of both IMSI and MSIN. The OUR also notes that the use of "subscriptions" denotes a wider description that can include person or machine thereby reflecting changing industry realities such as the use of machine-to-machine communication. The OUR will therefore modify its description of both IMSI and MSIN to be consistent with current best practices. The description of the acronyms will be amended as follows:

from International Mobile Subscriber Identity to International Mobile Subscription Identity; and from Mobile Station Identity Number to Mobile Subscription Identification Number.

In light of this, the following modifications will be included in the amended Guidelines as set out in the table below:

Existing Definitions	Proposed Amendments
-	Authorized Representative - A person authorized in accordance with this Guideline to sign and/or submit resource requests and other documentation described in this Guideline.
Mobile Subscriber – An entity of person that contracts to receive or pay for a public mobility service.	To be deleted.
-	National Mobile Subscription Identity (NMSI) - A number consisting of the MNC followed by the MSIN, a fixed length 12-digit number. It is the national portion of the IMSI (i.e., excluding the MCC).

3.3.40 As indicated in the Consultation Document, the definitions in the Glossary will be relocated to section 2.0 of the revised version of the Guidelines and the heading changed from "References" to "Definitions".

Determination #10 - Glossary

The Office will replace the definitions of the terms in the Glossary Section of the IMSI Assignment Guidelines, and add the new terms and definitions, as set out as "Proposed Amendments" as presented in the Consultation Document, and as reflected in the second column of the tables in paragraphs 3.3.36, 3.3.38 and 3.3.39 above.

All references to "subscribers" will be changed to "subscription" where the IMSI and MSIN are spelt out in the Guidelines.

These terms and their definitions will be set out in alphabetical order in section 2 of the amended Guidelines, which section will be relabelled "Definitions".

Amendment and Publication of the Guidelines

- 3.3.41 The Guidelines will be modified in accordance with the Determinations set out above. As stated in the Consultation Document, the numbering and formatting errors found in the existing IMSI Guidelines will be corrected in the revised version. Additionally, if any typographical, grammatical, or spelling errors are observed, these will also be corrected in the revised version of the Guidelines.
- 3.3.42 The renumbering of the Guidelines and addition and removal of some provisions as set out in this Determination Notice will likely result in some provision references in the revised Guidelines becoming inaccurate or obsolete. In light of this, all provision references in brackets throughout the Guidelines that do not impact the substance of the provision in which they are found will be deleted in the revised Guidelines.
- 3.3.43 The revised Guidelines will be published as a revised Annex 2 of the Telecommunications Numbering Rules and Number Assignment Guidelines (Document No. 2020/TEL/008/RUL.001) and will become effective on 2025 April 18.

Determination #11

- (a) The IMSI Guidelines will be amended in accordance with Determinations 1 through 10 of this Determination Notice.
- (b) The numbering and formatting errors found in the existing IMSI Guidelines will be corrected in the revised version, as will any typographical, grammatical, or spelling errors identified. Also, provision references in brackets that do not impact the provision in which they are found will be deleted in the revised Guidelines.
- (c) The revised IMSI Guidelines shall become effective on the date of publication, which shall be 2025 April 18. They will comprise Annex 2 of the Telecommunications Numbering Rules and Number Assignment Guidelines (Document No. 2020/TEL/008/RUL.001).