

ETNO Common Position on misuse of E.212

Executive Summary

ETNO recognises that strict adherence to E.212 principles identifies the country and the network of the customer and rejects the use of foreign MCC/MNCs. This should be preferred as the primary way to resolve the issue of usage of E.212 codes.

ETNO considers that these principles must be agreed on in the same grounds and enforced by all countries, taking into account a sufficient period of time to allow the operators that currently use foreign MCC/MNCs to migrate their IMSIs to the local MCC.

It is also ETNO's view that there are several aspects that pertain to the use of foreign MCC/MNCs to consider and these must be clearly separated. ETNO indeed recognises that in some neighbouring countries and possibly due to the specifics of the geography in these regions or their history, cross-border coverage exist, For example, the case of the Italian E.212 resources used cross-border in Vatican City and San Marino.

Position:

ETNO recognises that strict adherence to E.212 principles should be preferred as the primary way to resolve the current issue. When this understanding of E.212 is agreed upon by all relevant parties, sufficient and economically-viable time should be given for the operators that currently use foreign MNCs to migrate their IMSIs to the local MCC. In this respect, the costs and technical difficulties for operators and the inconvenience caused to customers of such a migration should not be overlooked (e.g., SIM card updates).

Discussion:

In the current situation, that has the use of foreign MNC's in a national environment to provide service, ETNO makes the distinction between two cases. There is the case where the geographic areas concerned are not co-located. In which case the use of foreign MNC's is not permitted. The second case is where the geographic areas concerned are co-located, either with a common border, or where one country is subsumed within the geographic area of another , e.g. Vatican City. In this second case "leakage"

of the signal can not be stopped, and in some circumstances the signal from abroad maybe stronger, and therefore the one that the consumer has service from. This is a natural phenomenon, and can not be stopped. ETNO believes that the first case can not be permitted under the current rules of E.212, and that the second case can not be avoided.

The use of E.212 resources to support the perceived misuse of E.212 is done referring to the use of Home Network Identifiers. It has been noted that HNI is not present in the appropriate ITU Recommendations (see D30, ITU-T SG2 Meeting February 2005, Netherlands). ETNO prefer to use the terms MCC/MNC as this reflects the more appropriate use of the resources. In so doing the geographic significance within the resource is noted.

ETNO also recognises that if only one country (and one operator) would not adhere to these principles on the same grounds, the current situation will not progress. Worse, some operators may be compelled to migrate from one MCC to another MCC at high and possibly intractable costs while others would be allowed to continue using foreign MCCs. ETNO considers this as the worst-case scenario which should therefore be avoided.

Finally it is ETNO's view that there are several issues that pertain to the use of foreign MNCs to consider and these must be clearly separated. ETNO's concern is that situations that relate to Caribbean islands are compared with European countries sharing a common border whereas the two contexts and implementations are radically different.

ETNO indeed recognises that in some neighbouring countries and possibly due to the specifics of the geography in these regions, or their history, cross-border interaction may have its merits where radio signal leakage is sometimes inevitable. It is ETNO's position that in this case, it is not misuse of E.212 resources. ETNO's position is considered in this perspective.

The case of the Italian E.212 resources used cross-border in Vatican City and San Marino is a good example of such a situation. This case relates to Countries within the territory of another Country (an geographical enclave), and where both the countries share a common terrestrial border. The former cases are in ETNO's analysis no exception to E.212 principles; they merely result from the specifics of the terrain and the need for a optimal coverage.

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Introduction

The following contribution presents ETNO's position on the use of E.212 and offers some comments on the CEPT contribution. The contribution from CEPT (working group NNA) for ITU-T Study Group 2 Question 1 meeting in Stockholm discusses the interpretation of E.212 principles and the use of foreign IMSIs.

ETNOs Position

ETNO believes that the use of E.212 should adhere to the principles as stated in E.212 and related ITU-T recommendations. In the context of the current debate ETNO recognises two distinct cases. In the first case where the geographic areas are co-located, either with a common border or where one geographic area is subsumed within another, that cross border use cannot be stopped. One example of this is occurs in Italy, in its relation with the Vatican City. ETNO accepts that this case cannot be altered.

The second case where there is no such common geographic environment to support "leakage", ETNO believes runs counter to the principles and use of the E.212 resources. In such circumstances the practice should stop, and clarification of the concept of geographic use as outlined in this and other contributions to this and previous meetings be made in E.212.

In previous contributions to ITU-SG2, notably D30 (Netherlands), reference is made to the usage of the term Home Network Identifier (HNI). ETNO's position is that as this term is not part of the E.212 recommendation that it should not be used as part of the current ITU T SG2 discussions. Therefore the discussion should focus on the use of the terms MCC/MNC. A consequence of that is to reinforce the geographic coverage of the area in which the operator is permitted to provide service.

Comments CEPT contribution

It is our understanding that the “current questionable practice” is not exactly that which is described in section Rationale. Using the same notation, it appears that contrary to what is described in the contribution, no (new) MCCb+MNC identifier was assigned to a mobile network in country A: the questionable practice of foreign MNCs is that the use of an MCCb+MNC which is already assigned for a mobile network in Country B is extended to cover another mobile network in country A thereby merging the two networks into a single one.

The following comments refer to the items discussed in the CEPT contribution.

Comment on item #1:

In GSM at least, E.212 IMSIs are necessary during registration and authentication phase. It is our understanding that accounting and charging conditions as they are referred to in CEPT's contribution mostly depend on the called party's number.

Comment on item #4:

What the contribution refers to as the "nature of competition between mobile operators in some countries" is according to ETNO the core of the problem. In practice this situation may induce a breach of competition. In this respect ETNO considers that the choices made by a number of operators that use foreign MNCs were mostly dictated by the necessity to reduce operational and deployment costs. The incentive for entrants on the market is very strong indeed for resorting to foreign MCC/MNCs if it is already the norm in the commercial and regulatory environment of the country concerned.

It is therefore important that the relevant Administrations commit themselves to respect E.212 on the same basis so that competition on these markets is not impeded between those who do not use foreign MCCs and those who do.

Proposals

ETNO recognises that the situation has now occurred and would seek to have the situation of using MCC/MNC resources ceased in a reasonable time frame agreed upon and committed to by all concerned parties without exception.

One of the possibilities under discussion in ITU-T SG2 to tackle the issue, considers the possibility of documenting the situations where foreign IMSIs/MNCs are currently being used. ETNO believes that if this is to continue the concept of co-location of the geographic area needs to be included to identify the natural situation of leakage, and the “mis”-use of E.212.

If the use of foreign MNCs were allowed and documented for, it may not be realistic to consider that all countries will move to allowing their local operators to deploy mobile networks abroad using the home MCC as a foreign MCC. It may mean that those who cannot use their home MNC on foreign markets will inevitably be penalized compared with their competitors who may be allowed to do so. ETNO's view is that a further drawback of the current situation is that different E.212 identification rules apply to operators on the same market for the same service.