

**AT&T Comments on Draft CEPT/ECC Report 212 – Evolution in the Use of
E.212 Mobile Networks Codes**

AT&T Inc. and its affiliates that provide communications services to, from and within Europe (collectively “AT&T”), are pleased to provide the following comments on the consultation by the CEPT Electronic Communications Committee’s Working Group on Numbering and Networks (WG NaN) on the draft *ECC Report 212 – Evolution in the Use of E.212 Mobile Network Codes*, released on October 25, 2013 (“*Draft Report*”).

Extra-territorial Use of MNC Codes for M2M Services Should be Permitted

AT&T welcomes the WG NaN’s recognition of the emergence of different business models for M2M services and the need for innovative numbering solutions to accommodate the requirements of M2M customers and service providers. The WG NaN proposes a number of possible solutions to address the needs of these stakeholders, including:

- A shared national MNC for M2M customers;
- A unique national MNC for each M2M customer;
- A unique MNC under MCC 901 for each M2M customer that requires roaming or who operates in at least two different countries;
- A unique MNC under a new shared MCC 90X for these types of services.¹

AT&T believes that another, far more effective solution for global M2M services is for CEPT countries to explicitly allow the extra-territorial use of numbering resources, such as E.212 MNC codes (the subject of this report) as well as E.164 MSISDN ranges (discussed previously in ECC Report 194), for M2M services (and, if necessary, to specifically exempt such use from any more general prohibitions that may exist on extra-territorial use of numbers).² Such extra-territorial use of numbering for M2M services should not be confined to traditional roaming scenarios³ and should work in both directions: i.e., national regulators should allow use of their E.212 and E.164 numbering codes outside their national territories, as well as allowing the use of foreign numbering codes within their national territories. Indeed, this is an existing business and operational model being used with success in the incipient field of M2M, based on GSMA standards, and it is a positive factor in enabling the goals of a digital single market in Europe.

In the *Draft Report*, the WG NaN acknowledges that extra-territorial use of MNCs may occur but suggests that this requires “*special arrangements and bilateral agreements between administrations*”⁴ and that “*a more practical approach might be to apply to the ITU for a MNC under shared MCC 901 that can then be used in a ‘country agnostic’ manner.*”⁵ There are existing, well-established commercial models used between mobile operators that

¹ *Draft Report* at 6.2.1 and 6.2.2

² *CEPT/ECC Report 194 on Extraterritorial Use of E.164 Numbers* identifies M2M services as a candidate for exception to extraterritorial restrictions.

³ Indeed, in this regard, we note that, according to ITU-T E.212 Amendment 3 (06/2011), the extra-territorial use of an MCC+MNC is not intended to include roaming.

⁴ *Draft Report* at 4.7.2

⁵ *Id.*

provide a very practical, ready-made basis for accommodating and facilitating the extra-territorial use of MNCs and MSISDNs on a bilateral commercial basis. Foremost among these is the international M2M roaming framework, which is recognised by GSMA and endorsed through their adoption of an M2M Annex, specifically to address and make transparent international roaming used specifically for M2M services. AT&T further contends that there is little or no material or conceptual difference in such extra-territorial use of national MCC+MNC codes for M2M services, as compared to the scenario of an MNC under a MCC 901 or shared MCC 90X being used in a ‘country agnostic’ manner. In either instance, both the carriers involved and the governments involved have full transparency as to the operators they are working with. Given the existing use of this model, and the transparency that it enables, CEPT should recommend that this extra-territorial use of MCC+MNC, as well as MSISDNs, should be permitted, and studied further to ascertain its impacts.

M2M Business Models are Different from Traditional Mobile Services

As the WG NaN has correctly recognised, M2M business models are fundamentally different from traditional handset and tablet models, and given the tremendous potential they represent for economic growth, societal benefit, network investment and deployment, policy-makers must study this field with fresh eyes and, in the absence of any identifiable consumer harm, avoid premature regulatory intervention in a nascent market. M2M business models require large economies of scale, with efficient cost structures, to deploy a vast array of services, including for low ARPU devices.

M2M business models require delivery of services on a globally consistent manner, including being able to operationalise centralised manufacturing and plant resources, establishing common management systems for consistent policy controls (e.g., provisioning, customer care, cyber security, billing and reporting).

A fragmented distribution model, involving a separate SIM/IMSI per country, would prohibitively raise costs and stifle M2M innovation and deployment in most markets (e.g., automotive companies do not know the final destination of each vehicle at the time of manufacture, nor would a connected watch manufacturer, or a soil moisture detector, etc.). This will impact citizens in large and small markets, depriving them of leading edge innovation and competition. Even across the 28 EU markets, if a nationally fragmented approach for SIM/IMSI were to occur, there is a high risk that many markets could miss out on new M2M innovations due to the added expense and risk of a distinct IMSI platform. The same is true for EU device manufacturers that want to export around the world, and may find their distribution model constrained by a precedent that requires a separate IMSI platform for each export market.

A Global SIM/IMSI Approach is the Most Efficient Solution for Global M2M Services

The most efficient manner of delivering global M2M services is through the existing, well-defined, well established roaming framework. The roaming framework enables the use of the home carrier’s IMSI (E.212) and home carrier’s MSISDN (E.164) to provide services on a global basis through a single SIM architecture. This architecture can enable the most innovative devices, from large or small companies, to be deployed to any country in the world, thereby bringing the benefits of leading edge technology to all countries, businesses,



mobile operators and citizens. And with the business models used for M2M, where end users often pay no data transport charge, the traditional policy considerations relative to the level of roaming charges are not an issue.

Under the roaming framework, the GSM Association has already developed a specific framework for M2M, thereby established methods and procedures to transparently identify and measure M2M roaming traffic from traditional handset or tablet roaming traffic. Similar to traditional roaming, the M2M roaming framework encapsulates the inherent use of extraterritorial numbering resources. The M2M Roaming framework has been accepted within the GSM Association and is globally adopted by hundreds of mobile network operators who today enjoy the bilateral benefits of offering these services. This bilateral framework has enabled manufacturers both large and small to develop and export devices around the world, and to scale their business without the upfront entry barrier of establishing a distinct platform for each country before selling a single device.

A global SIM/IMSI approach using roaming can be just as efficiently implemented on extra-territorial use of a national MCC+MNC code as it can on a MCC 901 (or a new shared MCC 90X) MNC. CEPT numbering policies should allow for both variations of the global SIM/IMSI approach to be possible and should not favour one solution over another.

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AT&T urges the WG NaN to amend the *Draft Report* to affirmatively acknowledge the crucial existing role of extra-territorial use of numbering, including E.212 MNCs and E.164 MSISDN ranges, for delivering global M2M services; to conclude that such use is an appropriate, practical and efficient solution for meeting the requirements of M2M customers and service providers; and to recommend that such extra-territorial use for M2M communications should be permitted by CEPT countries. AT&T would be pleased to meet with the CEPT team to discuss this recommendation and its underlying rationale in further detail.

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Contact:
Mike Corkerry
Executive Director, EMEA Government Affairs
AT&T
mike.corkerry@att.com