

PO Box 286
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Saint Lucia

December 20, 2016

Managing Director
ECTEL
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Castries

Dear Sir,

Draft Mobile Electronic Communications (Roaming Services) Bill

Further to your request for comments on the Draft Mobile Electronic Communications (Roaming Services) Bill I hereby submit the following two comments.

1. **Section 7 speaks to Inadvertent Roaming. An effective way to prevent inadvertent roaming would be for the mobile networks to provide adequate signal coverage within the state's borders.** Inadvertent roaming is a regular occurrence in the Cap Estate area of the northern part of Saint Lucia where customers have to roam on networks in the neighboring island of Martinique to make or receive local calls to or from Saint Lucia!
2. **There should a section in the Bill to address the issue of mobile phones which are reported lost or stolen whilst roaming within the ECTEL Contracting States.** The GSM networks in Europe (the UK in particular) have sought to make lost or stolen phones less attractive to criminals through the implementation of Equipment Identity Registers (EIR) on their networks. The EIR is used to keep a list of phones which have been reported lost or stolen. Each GSM mobile phone carries a unique 15-digit identifying code called an IMEI number and this serial number is entered into the EIR database when a phone is reported lost or stolen. The UK mobile phone operators (in conjunction with the GSM Association) use a shared database or Central Equipment Identity Register (CEIR) which allows stolen or lost phones to be disabled on all networks by referencing each mobile phone's IMEI number. This means that the stolen mobile phone itself (and not just the SIM card which can easily be swapped) will be barred and will be unusable on any network, even if a new SIM card is inserted. This shared CEIR database was launched in the United Kingdom in November 2002. The CEIR database is also a global database and it is possible for GSM networks in the ECTEL region to access and upload /download data on blacklisted stolen handsets.

Presently phones which have been stolen in the UK may be activated in the ECTEL region if GSM networks here do not keep EIR databases.

The criminal underworld had sought to undermine the effectiveness of the CEIR by reprogramming the IMEI number on stolen phones to “create” new IMEI numbers which would not be detected by the CEIR database. The UK authorities, recognizing this threat, have passed legislation which makes it an offence to change, without the authorization of the manufacturer, the unique identifying IMEI number on a GSM mobile phone.

I therefore suggest that ECTEL initiate discussions with the mobile electronic communications networks and other entities in the ECTEL region on the implementation of similar measures which could make mobile phones less attractive to thieves. Alternatively the mobile electronic communications networks in the ECTEL Contracting States could voluntarily implement these anti-theft measures under the framework of their Corporate Social Responsibility (as good Corporate Citizens) to reduce crime within the region.

I trust that these comments will be considered by ECTEL.

Best regards,

Anselm Gittens, J69AH

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