

## IOC ISSUE/APPEAL IDENTIFICATION FORM

(See Section 6.3 for information regarding the completion and submission of this form)

1. Issue/Appeal Title: [Use of US MCCs AND MNCs in Caribbean Countries](#)

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2a. Originator: [Anne Cummins](#)

2d. Date Submitted: [02/03/04](#)

2b. Company: [AT&T Wireless](#)

2e. Appeal/Issue Number:

2c. Phone/Fax: [503 203 1184](#)

2f. Resolution Date:

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3. Issue/Appeal Statement:

### SUMMARY:

- The Caribbean countries share a desire for modern telecommunications services that they see every day on their (largely US influenced) popular media.
- Use of US IMSIs would make these new services available to them at affordable costs.
- If a GSM carrier wishes to share their "core" network, in particular the GPRS, SMSC, and SS7 networks, in order to bring these new services to the Caribbean they must be part of the same domestic network numbering plan, e.g. share the same format of network addresses, SS7 point codes, etc.

### BACKGROUND:

The countries of the Caribbean vary greatly in terms of history, politics, and culture but all share a desire for modern telecommunications services that they see every day on their (largely US influenced) popular media. These countries share two important characteristic that are relevant for this discussion -- they are typically very small, typically in the mid tens of thousands of population and very low (with a few notable exceptions) income per capita.

Recently some Caribbean officials argue that "shared HNIs violate Telcordia's recommendations/policy" and may interfere with the proper operations of the telephone network and as such can not support the application.

The ITU describes the IMSI (page i, Summary) as "required so that a visited network can identify a roaming mobile terminal or mobile user, e.g. in order to query a subscriber's home network for subscription and billing information."

AWS believes use of the U.S. codes in Caribbean countries is fully supported for the following reasons:

- Benefits to customers are substantial (as noted above).
- It is appropriate per the text and intent of ITU-T Recommendation E.212 and Annex A (as noted above).

- There are no technical difficulties or complications caused by use of U.S. codes. For instance, there is no technical impact whatsoever on interconnection or delivery of calls via the Public Switched Telephone Network, or the international long distance switch.
  - There is no possibility of any conflicts in IMSI assignments to specific customers.
  - Caribbean countries use E164 numbers assigned through the North American Number Plan Administrator under country code 1. Shared HNIs will present no conflicts to this arrangement.
  - The GSM Standard does not mandate the assignment or use of IMSIs within a given country. Domestic IMSI assignments are overseen by individual country regulators. Assignments of MNCs under shared MCCs are overseen by the ITU. Internationally, precedents exist for the use of US HNIs in other countries by US providers for their customers within those countries.
  - Moreover, current trends point to increasing use of US HNIs in the East Caribbean region. We understand that Digicel is using its Jamaica codes for its systems in Jamaica, St. Lucia and St. Vincent and The Grenadines, and will likewise be doing so in other new markets in the region.
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#### 4. Suggested Resolution:

AT&T Wireless requests that the IMSI Administrator issue a letter of clarification to AWS and the US wireless industry, that assignment of US IMSI's to a US-based provider's Caribbean customers, whose core network is shared with US customers and located in the US, will not interfere with the technical operations of the telephone network and as such, has no objection to the proposed technical application.

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#### 5. Issue/Appeal Status (per meeting):

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#### 6. IOC Resolution: