

**A Public Consultation Document
on
the Draft Regulation
For the
Registration of Subscriber Identity Module (SIM) Cards
in Papua New Guinea**

Issued by NICTA, Port Moresby on **19 July 2013**

Executive Summary

The National Information and Communications Technology Authority (NICTA) has prepared a draft regulation for the registration of Subscriber Identity Module (SIM) cards in Papua New Guinea. This Public Consultation paper invites feedback on the content of that draft Regulation, a copy of which is provided at Annex A.

This consultation paper is based on addressing the sale of pre-activated pre-paid SIM card issue which stems from the desire of government authorities and mobile operators to eliminate 'anonymous' or 'pseudo-anonymous' mobile phone customers. A Pre-paid mobile phone user without mandatory registration may present an inconvenience to law enforcement, public safety officials and national security agencies and even to the society in general.

The PNG government authorities are concerned enough about possible links between 'anonymous' pre-paid SIM card mobile phones and criminal and terrorist activities to make SIM registration mandatory.

The public consultation paper introduces a mandatory registration requirement for pre-paid SIM card mobile phones. This matter has been publicly debated in the country in considering legislation for the general principles governing the ownership and use of personal communication devices. The paper also proposes a set of regulatory strategies that could prove to be equally or more effective in achieving the objective of public safety and security.

NICTA seeks feedback and comments on these and other issues raised in the draft Regulation at Annex A and the proposed mandatory registration. Any party wishing to respond is invited to submit written comments before **Friday 19 August 2013**.

Introduction and Background

This Draft Regulation is made pursuant to NICTA's powers and responsibilities under Section 216, to give effect to the administration and implementation of Section 266 of the *National Information and Communications Technology (NICT) Act, 2009*.

This decision will introduce a requirement for Mobile Network Operator Licensees and holders of other types of Licenses that provide Prepaid Mobile Services in PNG to register verifiable subscriber data before activating Prepaid Mobile SIM Cards.

The purpose of the requirement is to establish a database of users and subscribers which will assist the relevant bodies in PNG with respect to supporting public safety and discouraging attempts to exploit ICT services for illicit purposes. A further purpose is to protect the details of subscribers from unwarranted exploitation by licensees.

NICTA has therefore prepared the draft Regulation at Annex A for that purpose. As required under section 229 of the Act, NICTA is engaging in a public consultation process before finalizing the proposed Regulation.

Public Consultation Process

The objective of this Public Consultation is to provide stakeholders with the opportunity to make comments to NICTA on the content and implications of the draft Regulation and the proposed mandatory registration to be imposed. Comments on the appropriateness and eligibility on the proposed mandatory registration are also welcome.

NICTA invites the general public, including Existing Licensees, private individuals, public organizations and commercial entities (together, the “Respondents”) to participate in this Public Consultation process. Respondents are invited to submit written comments in response to this consultation document no later than close of business on **Friday 19 August 2013**. Comments may be submitted to one or more of the following addresses:

a) E-mail to: uoome@nicta.gov.pg

b) Post to: Director Licensing and Enforcement
 Public consultation on Regulation for the Registration of SIM Cards in PNG
 National ICT Authority
 PO BOX 8444
 BOROKO NCD

NICTA welcomes all comments on the Public Consultation Document. In addition NICTA would welcome opportunities to discuss the draft Regulation and the related issues with Existing Network Operator Licensees who wish to do so.

Copies of all written comments submitted by Respondents in relation to this consultation process will be published on NICTA’s Public Register on the NICTA website at www.nicta.gov.pg consistent with the requirements on NICTA under subsection 229(3) of the Act. Any claims of confidentiality made by Respondents will be determined by NICTA on a case by case basis. Generally speaking, statements of opinion will not be regarded as confidential by NICTA.

ANNEX A.

SIM CARD REGISTRATION REGULATION 2013

1. Preamble

In exercise of the powers and responsibilities conferred upon it under Sections 216 (1.a) and 266 of the National Information and Communications Technology Act, 2009 (the “**Act**”), and of all other powers enabling it in that behalf, the National Information and Communications Technology Authority (“**NICTA**”) hereby makes the following Regulation.

Implementation of this Regulation should be in keeping with international best practice, with the view of supporting the interest of public safety and discouraging improper use of ICT services.

This Regulation will be reviewed after implementation by NICTA, which may, at its discretion, replace this Regulation after consulting as per the Act.

PART I – PRELIMINARY.

2. Definitions

(1) The terms and expressions defined in the Act shall have the same meaning in these Regulations, save that unless the context otherwise requires:

“**Activate**” means to allow full access to the electronic communication system of the Licensee who provides a mobile cellular Electronic Communications Service, including the ability to make and receive calls, and to send and receive short message services;

“**activated**”, “**activation**”, “**deactivate**” and “**deactivation**” shall be read and construed accordingly;

“**Activation Window**” means the period of one (1) week from the purchase of a SIM Card, within which a New Subscriber will be required to register with the relevant Licensee and within which, the Subscriber will be granted Full Access.

“**Authorized Personnel**” means an officer rather than the person formally and properly empowered to perform specified duties associated with the subscriber information database.

“**Biometric Information**” refers to the finger prints and facial image of a Subscriber;

“**Electronic Communications Service**” means any service which provides to users the ability to send or receive wire or electronic communications;

“Effective Date” means the date on which the SIM Card Registration Regulation comes into force;

“Existing Subscriber” means a Subscriber on a Licensee's electronic communication services system prior to the Effective Date of this regulation;

“Foreign Licensee” refers to a telecommunication and/or Electronic Communications Service provider licensed by a telecommunications regulator other than NICTA, to provide Electronic Communications Services in a country other than PNG;

“Identification Card” refers to any required form of card including driver's licence, citizen cards or valid work IDs with personal Information relating to aspects of a person's identity

“Identification Document” refers to any required form of document including passports and valid birth registration documents which may be used to verify aspects of a person's identity

“Information Database” means the central SIM cards database, containing the specific biometric and other registration information of all SIM card-based telephone Subscribers;

“Juristic Person” means a body of persons, a corporation, a partnership or other legal entity that is recognized by law as the subject of rights and duties.

“Licensee” means any telecommunication and or Electronic Communications Service provider licensed by NICTA for the provision of Electronic Communications Services (including Global System for Mobile, Code Division Mobile Access and fixed line services) in PNG;

“Limited Access” means the limitation by a Licensee of services available to a SIM Card to receipt of calls and short message service, and making of calls to emergency centre numbers and the Licensee's call centre only;

“New Subscriber” means a Subscriber who acquires a SIM Card or subscribes for the provision of Electronic Communications Service after the commencement of these Regulation;

“Personal Information” refers to information obtained from required valid identification card (s) or document(s) with full names (including surname), gender, date of birth, residential address, nationality, state of origin, occupation and such other personal information and contact details of Subscribers as NICTA may from time to time specify in a data dictionary for registration of SIM Card users;

“Proxy registration” means a registration performed with details of the registering person on behalf of a SIM card owner;

“Regulations” mean these SIM Card Registration Regulations;

“Reputable Person” refers to a trustworthy or respectable person who has a standing in the community. E.g., Commissioner of Oaths, Member of a Discipline Force, Ward Member, Village Court Magistrates, Church Pastors

“Security Agency” refers to either or all of the Royal PNG Constabulary, and other law enforcement agencies, including the National Intelligence Organization, as established by the Government of PNG;

“SIM Card” means a Subscriber Identity Module smart card containing the telephone number of a subscriber, encoded network identification details, the personal identification number and other user data such as an address book provided by a Licensee for the provision of Electronic Communication Services;

“Subscriber” means any person who subscribes for the provision of Electronic Communications Services either as a result of the purchase of a SIM Card or the conclusion of a contract for the provision of electronic communication service by a Licensee (including an employee of the Licensee or any person who receives or received such service as a gift, reward, favor, benefit or donation) and shall, where the context so admits, include both Existing Subscribers and New Subscribers;

“Subscriber Information” refers to the Biometrics or other Personal Information of a Subscriber recorded and stored by Licensees; and

“Subscriber Grace Period” means the [six (6)] month period from the Effective Date or such other date as NICTA may specify, within which Existing Subscribers will be required to register with approved SIM Card Registration Solution Providers pursuant to the Regulations.

(2) Unless the contrary intention appears, any words or phrase used in this Regulation and not defined in the Regulation but used in the Act have the same meaning or interpretation as given to them in the Act.

Question 1

Do you consider the definition of Part I of the draft Regulation sufficient? If not, please give reasons.

PART II – SCOPE AND OBJECTIVES

3. Objective

These SIM Card Registration Regulation are made to provide a regulatory framework for the registration of all SIM Card users, and for the control, administration, and management of the Information Database.

4. Scope

The Regulations shall apply to all Licensees and all individual, corporate, private and commercial users of SIM Cards in PNG but shall not extend to users of SIM Cards issued by Foreign Licensees, notwithstanding that such latter users are roaming on the network of a Licensee.

PART III – ESTABLISHMENT OF SUBSCRIBER INFORMATION DATABASE

5. Establishment and Maintenance of the Database

- (1) NICTA hereby undertakes to ensure that the Licensees establish a database for all recorded Subscriber Information to be known as the Subscriber Information Database.
- (2) The Subscriber Information Database shall be segregated across electronic communications service systems and domiciled and housed in a central location, providing a platform for central processing of all Subscriber Information in such a manner as to ensure easy access to data by authorized personnel.
- (3) The Subscriber Information acquired by the Licensees and/or its duly recognized agents and any databases, batching for transmittal and/or storage, developed there from shall belong to the Government of PNG.

Question 2

2.1 Do you consider the establishment, maintenance of the database and its ownership as appropriate?

2.2 If not, do you have other comments on Part III of this draft Regulation? Please explain.

PART IV – SIM CARD REGISTRATION

Any Licensee operating in PNG shall register all subscribers and SIM card holders using its network and services in accordance with the provision of these regulations.

6. Registration requirements

From the Effective Date, Licensees shall capture and transmit to the Subscriber Information Database:

- (1) The identification number of any SIM Card that is to be activated by a Licensee at the request of any individual Subscriber contemplated in Paragraphs (a), (b), (c) and (d) below;
 - (a) Biometric and/or other Personal Information of the individual subscriber obtained from valid Identification Card (s) or document (s) other than a juristic person, who requests the activation of such SIM Card by the Licensee; or
 - (b) Any existing registered subscriber identifying a new subscription subjected to the presentation of original Identification Card (s) or document (s) and physical presence of the individual subscriber who requests the activation of such SIM Card by the Licensee; or
 - (c) A reputable person who is an existing registered subscriber subject to presentation of a valid Identification Card (s) or document (s) in identifying a new subscription through a certified declaration and physical presence of the individual subscriber who requests the activation of such SIM Card by the Licensee; and
 - (d) In the case of a corporate body or other juristic person, the biometric and/or other personal information from valid identification Card(s) or document (s) of the authorized representative of the corporate body or other juristic person; and the name and address of the juristic person and, where applicable, the registration number of the juristic person.

Question 3 Part IV (6)

3.1 Do you agree with the registration requirements in subsection (6) (1) (a, b, c & d) of the draft regulation? If not, what other requirements do you suggest?

3.2 Is Biometric information a sufficient requirement to be implemented immediately? If not, please give reasons.

3.2 Should we accept other identification credentials as registration requirements apart from the Defined Identification? Please explain.

3.3 What minimum personal information is required from a new subscriber?

3.4 Is registration requirement under a corporate body (organization) adequate? If not, what other means do you suggest to this process?

7. Registration of New Subscribers

- (1) All Licensees are hereby required to register a minimum set of details as specified in Section (6) for New Subscribers.
- (2) Further to Section (6), from the Effective Date, all Licensees are hereby required to, at their own cost, implement a process to capture and transmit to their Central Database, Personal Information of New Subscribers including any Biometric Information, in accordance with specifications prescribed in the Schedule to this Regulation.
- (3) The failure by any Licensee to capture and register the details as specified in Section (6) and paragraph (1& 2) above or as may be stipulated from time to time by NICTA shall attract a fine of **K10, 000.00** per Subscriber.
- (4) Licensees shall, on a regular interval as NICTA may from time to time specify, provide updates or progressive reports as stipulated by NICTA in accordance with section (6) above.
- (5) Any Licensee that fails to provide the required Information in accordance with paragraph (4) shall be liable to a penalty of **K20, 000.00** after failure to comply with a written warning. Where the Licensee is found to have utilized the Subscriber Information in any business, commercial or other transaction, the Licensee shall, in addition to the above fine, be liable to a fine of **K20, 000.00** per subscriber and forfeiture of such commercial benefit derived from the unauthorized use of such Subscriber Information.

8. Non-activation of New SIM Cards prior to registration

- (1) Subject to paragraph (2) below, a Licensee shall not activate a SIM Card on its electronic communication system unless the Licensee has first registered the New Subscriber's details pursuant to Section 7;

Provided that the Licensee shall not be required to register the details of a New Subscriber of a Foreign Licensee, notwithstanding that such New Subscriber uses the electronic communication system of a Licensee to make, receive and send voice calls or data or access other services under a roaming or other similar arrangement between the Licensee and the Foreign Licensee.

- (2) Notwithstanding the provisions of paragraph (1), a Licensee may grant Full Access to a New Subscriber for the Activation Window upon registration.

Question 4 Part IV (7 & 8)

4.1 Do you agree with the provision of Subsection (7) (1 &2) of the draft regulation? If not, please give your reasons.

4.2 Do you agree with the set fine amount on Part IV (7) of this draft regulation? Please explain.

4.3 Is there another method or formula you would like to suggest for calculating fines per violation?

4.4 Do you agree with the provision of Part IV (8) of the draft regulation? If not, please give reasons.

9. Registration of Existing Subscribers

- (1) Licensees shall carry out the registration of a minimum set of details as specified in Section (6) for Existing Subscribers within the Registration Grace Period.
- (2) Licensees shall ensure timely registration of Existing Subscribers and shall promptly, upon elapse of the Registration Grace Period, deactivate any SIM Card where the Subscriber of such SIM Card has not been registered by the end of the Registration Grace Period.

10. Registration of Non Residents

- (1) A non-resident shall register his/her SIM Card upon presentation of his personal information through a valid passport and original travel document of the natural person using the network service.
- (2) Licensees must ensure any international roaming agreements with a Foreign Licensee should include access to roamers identification information that are roaming on the Licensees network and shall be made available from the home country.

11. Registration of Dependents

- (1) A Licensee or its representative will only register children that are above the age of 12. For any dependent who is a natural child at age below 12, the registration must be done by a parent or guardian.
- (2) Parents or guardians having a valid Identification Card (s) or document (s) shall register their dependent under their names.

12. Prohibition of Proxy Registration

There shall be no proxy registration of SIM cards and any persons registered pursuant to section (6) shall be liable for activities carried out on the SIM Card.

Question 5 Part IV (9, 10, 11, & 12)

5.1 What other forms of identification would be mandatory for existing subscribers?

5.2 Do you think the registration grace period is adequate? If not, please explain.

5.3 Do you think the verification processes should also be included in the registration grace period? If not, please explain.

5.4 Do you think the registration process for non-residents is adequate? If not, please give reasons

5.5 Do you agree with having registration of dependents? If not, please explain.

5.6 Do you think the minimum age limits set in this draft regulation for a dependent is adequate for registration of dependents? If not, please explain.

5.7 Do you agree with the provision of Part IV (12) of this draft regulation? If not, please give reasons.

PART V – THE SUBSCRIBER INFORMATION DATABASE

13. Operation of Subscriber Information Database

- (1) Licensees shall at such regular intervals as NICTA may from time to time specify, provide registration updates and details as stipulated by NICTA in accordance with Section 7 paragraph (4) of these Regulations when deemed necessary.
- (2) Subscriber Information received by Licensees shall be processed and stored in their respective Subscriber Information Database.
- (3) Subject to provisions of this Section 13, care, control and management of the Subscriber Information Database shall be vested in the Licensees.
- (4) Subject to the provisions of this Section 13, the Subscriber Information contained in the Information Database shall be held on a strictly confidential basis and no persons or entities shall be allowed access to any Subscriber Information on the Subscriber Information Database. The Licensees shall not under any circumstances duplicate, use, deal in or make copies of any Subscriber Information or store in whatever form any copies of the Subscriber Information for any purpose other than as stipulated herein or by an Act of Parliament of the Independent State of PNG.
- (5) Each Licensee has to ensure that subscribers are permitted to own a maximum of ONLY 2 (two) SIM cards and these SIM cards shall be permitted to access all network services on the date of registration.
- (6) Where a SIM Card has been deactivated, the Licensee shall keep the records of the relevant “existing subscriber” and or “new subscriber” for a period of six months from the date of the deactivation of the SIM Card.
- (7) Any Licensees who use duplicate or deal with Subscriber Information contrary to paragraphs (4), (5) and (6) above shall be liable to the penalty provided in Section 7 paragraph (3) of these Regulations.
- (8) Notwithstanding the provisions of paragraph (3) above and subject to the provisions of any Act of Parliament, Subscriber Information on the Subscriber Information

Database may be provided to a Security Agency, provided that a prior written request is received by the Licensee from an official of the relevant Security Agency who is not below the rank of an Assistant Commissioner of Police or an equivalent rank in any other Security Agency.

- (9) The written notice to be issued by the Security Agency pursuant to paragraph (8) above shall indicate the rank of the official of the Security Agency, and the purpose for which the Subscriber Information is required.
- (10) Licensees shall utilize Subscriber Information retained pursuant to paragraph (8) above, solely for their operations and shall not release such Subscriber Information to any third parties without obtaining the prior written consent of the relevant Subscriber.
- (11) The Licensee will not be allowed to use any personal information for other purpose without a prior consent of the concerned subscriber.
- (12) Notwithstanding the foregoing provisions of this Section 13, Subscriber Information shall not be released to a Security Agency or any other person, where such release of Subscriber Information would constitute a breach of the Constitution of the Independent State of PNG, or any other Act of Parliament, for the time being in force in PNG or where such release of Subscriber Information would constitute a threat to National Security.

Question 6 Part V (13)

6.1 Do you agree with limiting a subscriber to owning up to a maximum of two (2) registered SIM Cards per Licensee?

6.2 If not, what would be the maximum registered SIM cards a subscriber should have to limit the possibility of abusing the regulation?

6.3 Do you agree with the provisions of Part V (13) of the draft regulation? If not, please explain or comment on these provisions.

14. Data Protection and Confidentiality

- (1) Licensees shall take all reasonable precautions to preserve the integrity and prevent any corruption, loss or unauthorized disclosure of Subscriber Information retained pursuant these Regulations and shall take steps to restrict unauthorized use of the Subscriber Information by its employees who may be involved in capture and or processing of such Subscriber Information.

- (2) The Subscriber Information shall not be transferred outside the Independent State of PNG.
- (3) Any subscriber whose personal information is stored in the Subscriber Information database shall be entitled to view the said information and to request updates and amendments thereto.
- (4) The subscriber information contained in Central Database shall be held on a strictly confidential basis and no person or corporate body shall be allowed to have access to any subscriber's information on the Licensee's Database except where it is provided for in these Regulations.
- (5) Licensees and their agents involved in the registration services shall not under any circumstances use, duplicate, deal in or make copies of any Subscriber Information or store in whatever form any copies of the subscriber information for any purpose except where it is provided for in these Regulations and other applicable laws of the Independent State of PNG.
- (7) Licensees shall keep in good faith all personal information retained in accordance with these Regulations.
- (8) Licensees providing registration services shall not retain the personal data of any subscriber after transmission thereof to the Central Database.

Question 7 Part V (14)

7.1 Do you agree with the provisions of Part V (14) of the draft regulation? If not, please explain.

PART VI – INSPECTION, REGULATORY SANCTIONS AND APPEAL

15. Inspection

- (1) NICTA will ensure compliance with these regulations by carrying out inspections.
- (2) NICTA reserves the right to place appropriate sanctions on defaulting Licensees.
- (3) Without prejudice to other sanctions provided for in other relevant laws, a violation of a defaulting licensee shall be punished in accordance with the provision of these regulations.

Question 8 Part VI (15)

8.1 Do you have other comments on Part VI (15) of the draft regulation? Please explain.

16. Failure to Register, deregister or transmit subscriber information

- (1) Any Licensee who fails to register or deregister any natural person or legal entity commits an offense and shall be liable to a fine of **K20, 000.00**.
- (2) Any Licensee who transmits the details of a subscriber to an unauthorized third party also commits an offense and shall be liable to a fine of **K10, 000.00** for each SIM Card.
- (3) A Licensee who activates any SIM Card without registering and transmitting the personal information to the Central Database shall be liable to a fine of **K10, 000.00** for each unregistered SIM Card.

Question 9 Part VI (16)

9.1 Do you agree with the set fine amount on Part VI (16) of this draft regulation? Please explain.

9.2 Is there another method or formula you would like to suggest for calculating fines per violation?

9.3 Should repeated violations be treated differently?

17. Non-Compliance with activation and deactivation requirements

- (1) Any Licensee who activates a SIM Card in violation of Section 8 or who fails to deactivate a SIM Card in accordance with Section 9 shall be deemed to be in material breach of these Regulations and shall be liable to pay a fine of **K10, 000.00** per SIM Card or such other amount as may be fixed by NICTA.
- (2) Any person(s) who at the time of a breach of these Regulations was a director, chief executive officer, manager, secretary or other similar officer of the defaulting Licensee or was purporting to act in any such capacity or was in any manner or to any extent responsible for the management of any of the affairs of the Licensee or was assisting in such management:
 - (a) may be charged severally or jointly in the same proceedings with the body corporate; and
 - (b) if NICTA is satisfied that the body corporate is culpable, it shall also be liable to pay a fine of **K20,000.00** or such other amount as may be fixed by NICTA unless, having regard to the nature of the individual(s) functions in that capacity and to all the surrounding circumstances, he/she proves –
 - (i) that the offence was committed without his/her knowledge, consent or connivance; and
 - (ii) that he/she had taken all reasonable precautions and exercised due diligence to prevent the commission of the offence.

Question 10 Part VI (17)

10.1 Do you agree with the set fine amount on Part VI (17) of this draft regulation? Please explain
10.2 Do you have other comments on Part VI (17) of this draft regulation? Please explain.

18. Appeals

- (1) The Licensee has the right to appeal if not satisfied with the fine imposed by the virtual of these regulations.
- (2) The Licensee making the appeal will be given at least seven working days advance written notice of the date of the appeal hearing.
- (3) At the appeal hearing, the grounds of appeal shall be treated as a new complaint and the issues to be considered in their entirety.
- (4) Decisions of the regulatory board on the appeal shall be reached and communicated to the concerned licensee within seven working days from the date of the appeal hearing.
- (5) Decisions by the regulatory board shall be binding subject to the decisions being overruled by a competent court.

Question 11 Part VI (18)

Do you agree with the provisions of Part VI (18) of the draft regulation? If not, please give reasons.

PART VII – MISCELLANEOUS

19. Amendments

NICTA may from time to time issue additional directions, decisions or orders on any aspect of these Regulations, and either of general application or specific to a Licensee. NICTA may also revise these Regulations, or part thereof, at any time.

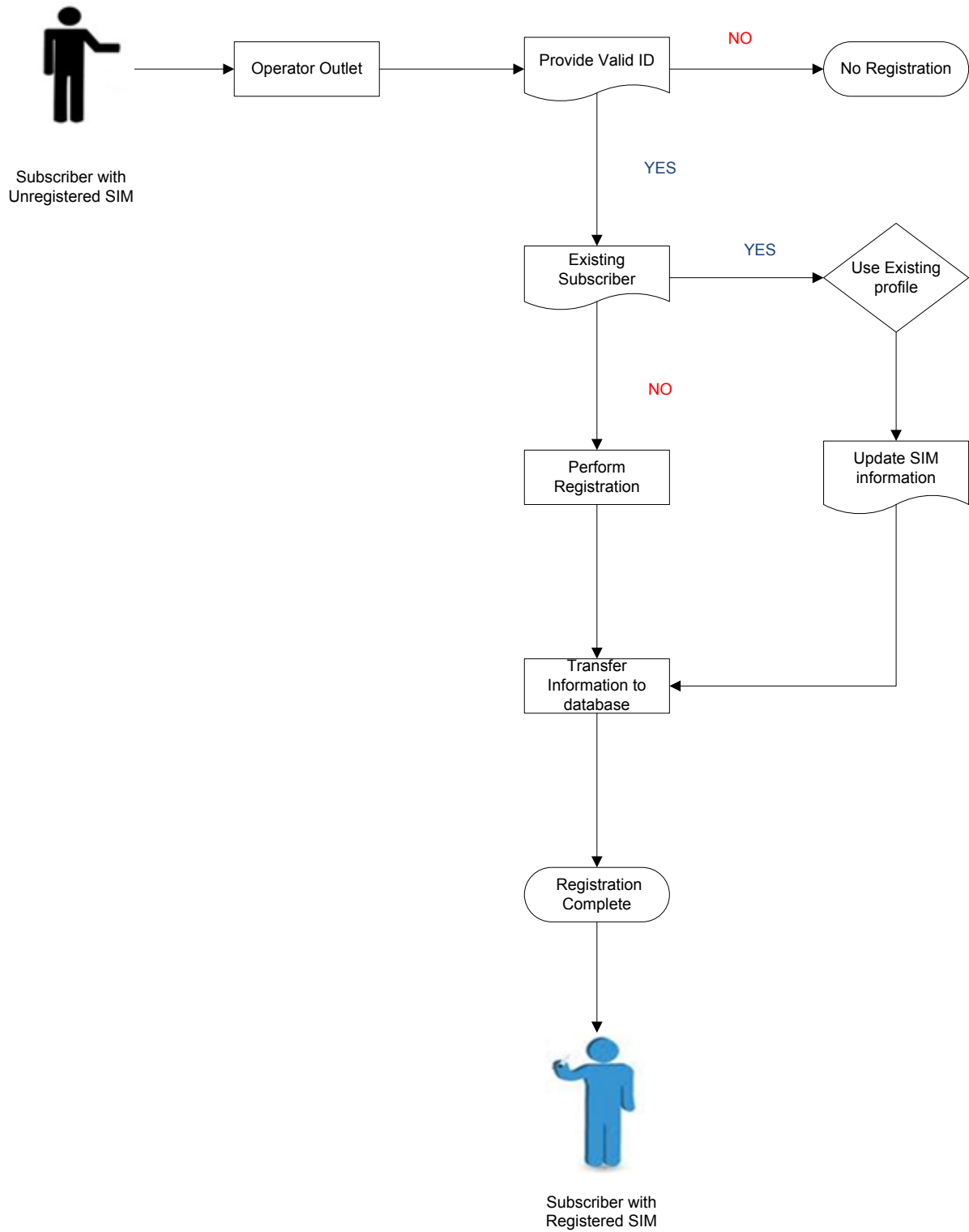
21. Application of the Business Rules of NICTA

The provisions of the Business Rules of NICTA as amended from time to time, shall apply to these Regulations.

22. Short Title

These Regulations may be cited as the SIM Card Registration Regulations 2013.

23. Flow Chart for Subscriber Registration Process



24. Schedule

Title	Implementation of SIM Card Registration Regulation, 2013.
Description of issue	<p>The SIM Card Registration Regulation, 2013 intends to protect mobile users and ensure crimes are not committed through improper use of the services provided.</p> <p>The first draft for public consultation ensures proper feedback for the final document.</p> <p>A copy of the draft Regulation is available at www.nicta.gov.pg</p>
Consultation to finalize the Regulation	<p>NICTA undertakes to commence consultation with key public and private stakeholders upon the NICTA Board's approval.</p> <p>Consultation to commence in 19 July 2013 and end on 19 August 2013</p> <p>The final Regulation document is to be prepared by 18 September 2013</p>
Date of Enactment	Subject to NICTA Board's Approval and NEC consideration, The SIM Card Registration Regulation, 2013 should be enacted by 31 October 2013 .
Date for Implementation	Implementation of the SIM Card Registration Regulation, 2013 is to commence no later than 1 January 2014 . This ensures that mobile operators are given time for necessary preparation
Expected timetable	<p>Mobile Licensees are to give six (6) months grace period to existing subscribers to complete registration of their SIM cards. The deadline for this is exercise; 1 July 2014.</p> <p>Activation window of one (1) week is given to new subscribers to complete registration of their SIM Cards</p>
Contact details	<p>Mr. Une O'Ome</p> <p>Director</p>

	Licensing and Enforcement Department Telephone: (+675) 303 3254 Facsimile: (+675) 300 4829 Email: uoome@nicta.gov.pg
Date schedule last modified	9 July 2013

General Observations

Questions 12

12.1 What other issues do you think should be included in, or excluded from, this draft regulation? Please support your comments with detailed reasoning.

12.2. Is the Flowchart for Subscriber Registration Processing virtually represented? If not, do you have any suggestion for improvement?

12.3 What is your opinion on the time schedule on Part VII (23) of this draft regulation?

12.4 Is it practically adequate for its implementation? If not, do you have any suggestion for improvement?