

[X] Public – [] Internal Use – [] Confidential – [] Strictest Confidence

Distribution: General Public

Queries received on the Mobile Proxy Forum's Request for Information to provide a Standardised Proxy Lookup service

RFI Section	Query	Mobile Proxy Forum Response
2.5 Evaluation	How would the RFI proposals be evaluated by the Steering Committee of the Mobile Proxy Forum (MPF)? Would the Steering Committee members that have interests in any of the proposals participate in the decision process? We suggest creating a dedicated sub-group of the Steering Committee to evaluate the RFI proposals. That group should exclude representatives from entities with interests in favour or against any of the proposals presented. These group members should be approved by the members of the Steering Committee considering the proposals submitted, and before proceeding to analyze them. This group would analyze confidentially all the proposals and present their results to Steering Committee.	Noted, thanks. The RFI is to determine what capabilities exist within the market to fulfil the service need, rather than make any conclusions as to specific suppliers.
1.3 Summary of Requirements ref. Availability	We assume that the service and the platform should have auto scaling capability and high availability, within an end-to-end scope in order to ensure a monthly uptime percentage greater than 99.98%. Is the said committed availability target be the benchmark against which assess the said capacity for scalability and availability, or would there be some specific volume testing required?	Capacity isn't expected to be a defining element of the service selection. Vendors would be expected to self-certify to a defined performance level, and this might form part of the contractual requirements.
SPL Rules document: 4.2 Rules for joining the SPL service	The SPL Rules document makes reference in section 4.2 b) to a participant acting as IRP or RRP or both. Does this mean that from the outset, the MPF foresees the possibility for third parties with no proxy look-up database of their own to access this service as "IRP-only" participants? Considering that in principle what makes sense is that any customer being able to pay should also be able to receive, what kind of application is expected from this and which different criteria would be applied to qualify participation by IRP-only participants versus others?	Payment Initiating Service Providers under PSD2 would be an example of an IRP-only group, licenced as a PSP, but with no account base to share with the wider community. Alternatively, some organisations might decide to be "receive only", and not allow their customers to send. Or they might find themselves in a situation where send capability can be delivered quickly, but receive takes more time. The rules allow for all of these things.

1.3 Summary of Requirements ref. Data Retention	Under the heading “Data retention and data protection” the RFI document makes reference to the service being a strict messaging-only platform with no retention of transaction data content. Is that considered compatible with the Rules document where it is stated inter alia in Section 3 that “The service will keep track of queries processed for the purpose of providing an audit trail to relevant parties involved”? Furthermore, would it be acceptable that non sensitive data be kept if in doing so the quality of service is materially improved in some cases?	We are seeking to avoid caching of responses and the use of that data to build up a central database of personal customer data. So the audit trail could include the company sending a request, the phone number being requested, and the company that provided the response back, but not the details of the response itself.
1.3 (Rules: 3 (Meta) Governance)	Do the “Registry Providers” need to be Telco service providers?	No.
1.3 (Rules 3: (Meta) Governance)	When the IRP makes a request, must the RRP respond in real-time?	Intended answer is yes, if they take too long it is expected their response will be ignored by the SPL solution.
1.3 (Rules: Annex I)	What “speed of propagation of changes” are expected from the solution? There is an example of 1 second.	It’s not expected there will be any propagation of changes. Each IRP request is unique and should not be cached.
1.3 (Rules 4: SPL Service Rules)	Who sets the rules for screening of prospective RRP’s? What are the rules expected to be? Who enforces the rules?	The rules have been defined by the MPF. They will be inherited, and can be changed in future by the SPL Scheme Manager
1.3 (Rules 4.2.b)	Can the IRP and RRP be the same entity in one single transaction? Sometimes RPs might want the SPL Service to provision their own subscriber base directly.	If the SPL provider also had its own registry base, then in theory the answer would be yes, but that would be as part of its own service rather than the one we are looking for.
1.3 (Rules 3: (Meta) Governance)	Will there be any peering between different RP’s? For example, only a set of RRP’s are accessible by a certain IRP.	Not in scope.
1.3 (Rules 3: (Meta) Governance)	With respect to privacy, will there be any personal information expected to be stored in the registry other than the phone number?	SPL isn’t a registry. RRP’s are likely to hold name, IBAN, Phone number (or other proxy).
n/a	Can the SPL be hosted in the cloud such as a private cloud?	There’s no objection to this if it provides adequate access and security.
1.3	Please share anticipated volumes of the member countries.	No further information available.

n/a	What are the liabilities of the SPL Service Operator, if any?	These relate to the proper and legal use of data.
n/a	Please describe the transaction process flow including the SPL Scheme Manager, SPL Service Operator, IRP and RRP.	IRP makes a request to the SPL (operated on a day to day basis by the SPL Service Operator). SPL then asks connected RRP's if they know of the proxy. Scheme Manager manages the rule book of the SPL scheme.
1.3 (Rules 3: (Meta) Governance)	What is the difference between the SPL Service Operator and the SPL Scheme Manager	SPL scheme manager contracts with the Service operator to provide the SPL solution. Simplistically, scheme manager looks after the service governance, service operator keeps the hardware working. It is possible that the service operator could be given the job of being the scheme manager.
1.3	The RFI states, "It is strictly a messaging platform and not a database or registry service", which is confusing. Please clarify.	SPL is expected to cache or store customer data for no longer than required to complete the lookup.
1.1	Is the RFP expected to be raised as a public tender (public law) or as a private tender (private law)?	Our preference would be for Private Tender.
1.2 and 3.1 R11 – R14	Although it is indicated that no commercial model is preferred: What is the expected share of responsibility to be taken over by the future service provider? A pure technical provider or a provider to run the service with full operational and commercial responsibility?	This will be decided largely on the basis of the capability of the solution provider, and the level of confidence that they provide in terms of aligning with the direction the MPF want to take.
1.3	You state that initially one registry provider per country is intended, but also multi-national services and domestic registry providers are expected. Are these providers already selected? If yes, who are they?	The SPL is intended to connect any registry that is interested in doing so. Registries can therefore be regarded as self-selecting. A registry shouldn't be prevented from joining the SPL (assuming if it meets the criteria for joining), just because another provider for a country already is taking part.
1.3	Who is intended to be the major users (registry providers) of that platform, banks, TTPs (like TelCos) or also others? If others, pls also indicate potential users.	Please see the answer above. A list of the Mobile Proxy Forum members can be found on the EPC website.
1.3	Could you please elaborate more on the relevant European data protection rules	This refers to GDPR, plus any other local data protection rules.

	and regulations in the context of the expected SPL-service.	
1.3	We interpret the expected SPL-service as one pan-European service. You state that compliance and assurance to security, privacy and other regulations of member countries is expected. Is it correct that therefore for each country the service is expected to work “differently” (according to such regulations)?	Whilst the local or domestic services may work differently, where data is being shared or collected via the SPL, a common standard is expected to be agreed and followed.