

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Technological Advisory Council Report	)	ET Docket No. 14-143
On Mobile Device Theft Prevention	)	
	)	
	)	

**COMMENTS OF THE ALLIANCE FOR  
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Wireless Technologies and Systems Committee (WTSC), hereby submits these comments in response to the Federal Communication Commission’s December 12, 2014, *Public Notice* in the above referenced docket. This *Public Notice* solicits input on the *Technological Advisory Council (TAC) Report on Mobile Device Theft Prevention (MDTP)*, which includes recommendations for steps to reduce mobile wireless device theft. In these comments, ATIS: (1) provides an update on ATIS’ relevant work programs, including work underway to develop standards to obtain device identifiers from smartphones that are locked or inoperable; and (2) notes that there is no need for new mobile wireless device identifiers.

**I. Introduction**

ATIS is a global standards development and technical planning organization that leads, develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS’ diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless

and wireline service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the Long Term Evolution (LTE) and LTE-Advanced wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS' WTSC coordinates, develops and recommends standards and technical reports relating to wireless/mobile telecommunications networks. WTSC is the primary industry committee within ATIS that focuses on next generation wireless issues, including those wireless issues that are specific to the implementations of LTE in the U.S. WTSC is also the lead on multiple joint industry standards projects, including work on SMS to 9-1-1, coexistence and interference issues, Wireless Emergency Alerts, and public safety mission critical Push to Talk (PTT) voice interoperation between Land Mobile Radio (LMR) and Long Term Evolution (LTE) systems.

## **II. Comments**

In the *Technological Advisory Council (TAC) Report on Mobile Device Theft Prevention (MDTP)*, there are multiple recommendations directed at the Commission and at industry to help reduce mobile device theft. Among these is a recommendation (Recommendation 1.5) that “ATIS in coordination with other appropriate industry groups (e.g., GSMA-NA Regional Interest Group) be tasked with developing standards, methods and procedures to obtain device identifiers from smartphones including those which are locked or rendered inoperable.”

ATIS has initiated work on this issue within its WTSC. This work is aimed at developing best practices for ensuring access to the wireless device identifier on wireless phones, even those that are locked or inoperable. ATIS notes that, for GSM and LTE devices, the GSMA has defined a method for obtaining the appropriate device identifier – the International Mobile Device Identifier (IMEI) – by entering “\*#06#” on the keypad. However, the ability to enter this code is dependent on the ability of accessing the keypad, which may be problematic when the device is locked. Further complicating this issue is the fact the keypad displayed to enter the password required to unlock the device may not contain the “\*” or “#” keys, which would make it impossible to enter the \*#06# string when the device is locked. The work program within WTSC will identify use cases in which law enforcement, carriers or third party resellers may need to obtain the device identifier and to develop best practices to insure that “\*#06#” works for these use cases.

ATIS’ work on this issue is focused on the use of the existing IMEI identifier, which ATIS believes can be used effectively to combat device theft. ATIS notes that the GSMA maintains a central IMEI database containing information on the allocation of 15-digit IMEIs by manufacturers of 3GPP-compliant devices. Access to this database is provided to GSMA member mobile network operators and to qualified industry parties, including regulatory authorities. The IMEI database also supports the maintenance of a “black list” of IMEIs associated with mobile devices that should be denied service because they have been reported as lost, stolen, faulty or otherwise unsuitable for use. This list is stored in the Central Equipment Identity Register (CEIR) that acts as a central system for network operators to share their individual black lists so that devices denied service (blacklisted) by one network will not work

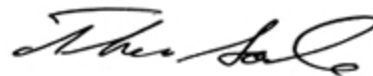
on other networks. ATIS believes that appropriate use of this existing industry resource would be effective in addressing wireless device theft.

Given that appropriate use of the IMEI database would be effective in addressing wireless device theft, ATIS cautions against the creation of a new device identifier. A new identifier may needlessly impose additional burdens on the industry and would require the modification of existing or creation of new standards. While use of the IMEI is well understood and addressed in industry standards, accommodating a new identifier would require additional time to create/modify standards and impose additional costs to the industry to implement the new identifier and associated standards.

### **III. Conclusion**

ATIS appreciates the Commission's efforts to address mobile wireless device theft in the U.S. As noted above, ATIS WTSC has already initiated work to develop standards to obtain device identifiers from smartphones that are locked or rendered inoperable. ATIS will provide updates to the Commission on this work program as it progresses.

Respectfully submitted,



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