

SIM farm Consultation
Economic Crime Directorate
Homeland Security Group
Home Office
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To whom it may concern,

SIM FARM CONSULTATION: MULTI-SIM DEVICE USE FOR OUT-OF-STUDIO BROADCASTS

I write on behalf of the commercial radio sector to highlight serious concerns with the proposed definition of SIM farms set out in the Home Office's consultation on preventing the supply and use of SIM farms in order to tackle fraudulent use of these devices.

While we understand and support the policy intention of these proposals – namely to prevent harm to the public that results from illegal activity using SIM farms and similar technologies – there appears to have been a significant oversight in the proposed definition which would see devices which contain more than four SIM cards banned entirely.

The consultation document states that there is '*very limited evidence that there are any legitimate use cases for devices that allow the use of more than four SIM cards, and for all such cases alternative options exist.*' However, this statement does not take into the account the ways in which Ofcom-licenced radio broadcasters routinely use multi-SIM devices for any out-of-studio broadcasts (e.g. from outside Westminster or covering any outside event), where they cannot access a wired internet connection.

Radio broadcasters use multi-SIM equipment for content gathering, to either aggregate bandwidth for high-quality contribution connectivity from outside broadcasts, or to provide a diversity of network providers in crowded event environments. There is no doubt that proposals within the consultation, if implemented, would result in serious operational challenges, particularly for the production and broadcasting of news content.

We understand from conversations with officials at DCMS that it is not the Home Office's intention to disrupt broadcasters' legitimate use of multi-SIM equipment. We would therefore be happy to facilitate gathering the relevant technical teams from broadcasting groups with government officials involved in the consultation, to work through an appropriate definition of SIM farms and avoid such negative unintended consequences.

Yours sincerely,



Matt Payton
Chief Executive