

Analysis of Tanzanian SIM card Registration Regulations

Introduction

The following notes are a summary of some of the provisions of the Tanzanian 'SIM card registration regulations' [Ref. 1] that seem to be of particular relevance to the development and use of AWSOM.

That document was obtained from the Tanzania Communications Regulatory Authority web site [Ref. 2].

These notes are my personal interpretation of the regulations, without the benefit of knowledge or experience of Tanzanian law. Competent legal advice should be sought if any point raised is considered significant.

Notable points

The Eleanor Foundation appears to be an 'Institution' for the purpose of these regulations [Part 1].

An Institution is permitted no more than 50 SIM cards for machine to machine communication (e.g. AWSOM units) without written authorisation [18(1b) and 18(3)]. Authorisation is by written communication.

The registered user of the SIM card is advised to change the PIN originally assigned by the supplier [4(1b), 8(4), 8(5)].

The new PIN should be 'random' [8(5b)].

A SIM card should be de-activated by the licensee (the service provider) if not used for any period of 90 consecutive days [9(6)].

The registered owner of a SIM card must report change of ownership or possession of the card to the licensee (the supplier of the card, who is required to maintain the registration records), and report loss or theft to the police [12, 13].

Here are my conclusions

SIM cards in Tanzania are carefully managed and monitored, unlike the situation here in the UK where we can pretty much use and abuse them at will.

It is a legal requirement in Tanzania to use a PIN code on SIM cards. Whether a Tanzanian SIM card can or cannot be unlocked is now irrelevant – even if we could unlock one we must not do so because the registered owner would be committing an offence by using it. Therefore, we have to deal with PIN codes!

Eleanor Foundation will need to make a written request when SIM cards are required for more than 50 AWSOM well units.

SIM PIN codes can, and should, be changed before first use. Therefore we should provide a simple means to change, in-country, the SIM card PIN on both the card itself and the related AWSOM unit in which it is used.

I could find nothing in the regulations that ties a particular SIM card to a particular device that uses it. If that does happen, I believe that it must happen in the network and should be able to be corrected on request. Our SIM800 units should not be permanently committed to a particular SIM card and should not be altered in some way if the installed card has a problem.

Do not store SIM cards for extended periods (definitely not more than 90 days), whether or not they are installed in AWSOM units. This also suggests that SIM cards should be obtained only when they are actually needed, to avoid the aggravation of requesting re-registration.

The registered owner of a Tanzanian SIM card would be taking a significant risk by letting it out of his or her possession. If it gets lost or stolen it is the registered owner who risks prosecution if the loss is not reported. So, although I suggested this myself, given the freedom that we enjoy in the UK to do what we like with SIM cards only provided we can pay the bills, having seen these regulations I now think that we definitely should not ask anyone to send us one from Tanzania.

Further thoughts

In these regulations, penalties for offences are defined only as minimum fines or prison terms, without upper limits – Scary!

The previous version of these regulations is only 2 year old so this seems to be a bit of a moving feast and we will need to keep an eye on this for future changes.

References

1. Tanzanian Government Notice number 112, 7 February 2020. 'The Electronic and Postal Communications (SIM Card Registration) Regulations 2020'.
2. Tanzania Communications Regulatory Authority web site
<https://www.tcra.go.tz/>.

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