



Crout GmbH · Echterdingerstr. 57 · 70794 Filderstadt

Dear valued Customer,

Crout has been informed that the Turkish Telecom Regulation has changed its stance on permanent roaming for all devices that roam in Turkey.

What are the new laws introduced by the Turkish Telecom Regulation?

According to Turkish Law 7186 & 23 permanent data roamers will be banned from Turkish MNO networks. The Turkish regulator has decided that Permanent Data Roaming is no longer allowed in Turkey, whereby a Permanent Data Roamer is defined as a cumulative user of roaming services on the same IMEI for 91 days (accumulated) or more per 120 days period on the network where voice service users will be excluded. This threshold of 91 days will be based on use on all Turkish Roaming networks together.

When will this take effect?

This directive has already been enacted by the Turkish Government so we recommend that our customers take immediate action to ensure continuity of service.

If I continue permanently roaming in Turkey can my devices be identified?

Yes. The Turkish regulator has the information to analyze roamers and is identifying permanent roaming blocking lists. If you do nothing your devices will therefore lose connectivity once they are identified by the regulatory.

How can I keep devices permanently online in Turkey?

It is only possible to use a device in Turkey if your device has a Turkish subscription and if the IMEI is registered via the [Turkish eGovernment Portal](#).

Starting from the moment the regulator includes an IMEI to the blocking list, device owners will have 30 days to register their devices with a Turkish

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subscription. After the new subscription has been activated, the device is fully compliant.

The identified IMEI will **only** be able to generate traffic within Turkey when it is linked to a **Turkish subscription**. The entity entering into a Turkish subscription should be located in Turkey, or a contact (Turkish or foreign) located in Turkey should sign the subscription agreement. Several documents are required for registration, including the Turkish Identification Number and Identity Document and the document indicating that the person is authorized to represent the entity and the signature circular. In case the authorized representative is a non-Turkish person, Foreign Citizenship Identification Number and card is required.

Is there a cost to registration?

Yes. The Turkish regulator has chosen to ask for a payment of 250 Turkish Lira (approx. €34) for the registration of the IMEI with the Turkish subscription. This registration can be done through the [Turkish eGovernment Portal](#).

Is incidental roaming still allowed?

Yes. Turkish networks are still available on our roaming profiles but access is based on devices operating under a temporary roaming scenario in Turkey for no more than 91 days over the course of a 120-day period.

Is this the start of multiple operators and countries closing down permanent roaming?

No. There are very few countries that are as protectionist as Turkey, and where they wish to have complete control over all data that is being generated in the country.

The wider issue of permanent roaming is about two things;

1. The carrier wants to ensure that it makes a profit on devices using their network. If M2M devices are permanently roaming and only using a few MB of data they currently don't make sufficient to cover signaling and traffic cost.
2. Carriers are seeking a level playing field with local pricing.

Both of these are commercial issues as opposed to technical or regulatory. We do foresee carriers adding a minimum fee per IMSI for permanent roaming to ensure a minimum return and a level playing field.

Therefore, prices may increase over the coming years.

Should you have any questions, please contact us by email at support@crout.eu .

As always, thank you for your business and the opportunity to serve as your trusted advisor to simplify the complexity of IoT.

Kind regards

Your Crout Support Team