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GSMA INQUIRY

This document contains an excerpt of an inquiry sent on Sep 02, 2024 to [GSMA](#) organization and its Security Group. The organization provided answers on Sep 03, 2024, which are inlined below (purple color).

GSMA also informed that it runs the Security Accreditation Scheme (SAS), which certifies the production security of SIM card manufacturing sites (www.gsma.com/sas) and that SAS includes a requirement (FS.18 requirement 2.3.1) for sites seeking SAS certification to have an incident response process that includes notification to any external third parties possibly impacted by a security incident at the site. The scope of this requirement covers security incidents affecting the production site, the requirement's scope does not cover product security vulnerabilities.

1) Do SIM card vendors have obligation to inform:

- a) its customers
- b) shareholders

about security issues present in its products and/or services ?

GSMA does not have this information. Please contact SIM card vendors directly for responses.

2) Would not fulfilling 1) be violating any laws or regulations ?

As above.

3) Do SIM card vendors have obligation to fix security issues affecting its products and/or services ?

As above.



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4) Would not fulfilling 3) be violating any laws or regulations ?

As above.

5) Do SIM card vendors have obligation to communicate to the public the presence and fixes for security issues affecting its products and/or services ?

As above.

6) Would not fulfilling 5) be violating any laws or regulations ?

As above.

7) Do SIM card vendors have obligation to inform GSMA and/or MNOs about most serious security vulnerabilities (such as remote ones or with the potential to impact the privacy and/or national security) ?

SIM card vendors may be subject to laws and regulations that require disclosure to relevant stakeholders, including GSMA and/or MNOs. Please contact SIM card vendors directly for responses.

8) Would not fulfilling 7) be violating any laws or regulations ?

GSMA does not have this information. Please contact SIM card vendors directly for responses.

9) Does GSMA have any way in finding out information whether MNOs have been provided with security patches / mitigations with respect to security vulnerabilities affecting SIM cards (or whether vulnerable SIM cards has been replaced by the vendor) ? In other words, is there any way for GSMA to find out the usage / patching status of a given SIM card model / type across all MNOs ?

GSMA has no role in the relationship between SIM card vendors and their customers, so would not normally have any role in this activity.



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10) Does GSMA have any power to request said information (9) from SIM card vendors / GSMA members (MNOs) ?

GSMA has no role in the relationship between SIM card vendors and their customers, so would not normally have any role in this activity.