

Sent by email to: [REDACTED]

17 April 2026

To Whom It May Concern at Sure Jersey Limited

The Citizen Lab, an interdisciplinary laboratory based at the Munk School of Global Affairs & Public Policy, University of Toronto, is currently researching the use of global telecommunications infrastructure in targeted surveillance activity.

Our research has identified network activity associated with Diameter protocol signaling addresses and infrastructure attributed to the Airtel Jersey in connection with the following:

- A location tracking operation targeting a single mobile device observed on February 11, 2025.
- The IMSI network identifier of the targeted device was a subscriber of a foreign mobile network operator.
- Diameter location tracking requests were sent using Diameter Origin-Host and Origin-Realm network identifiers attributed to multiple network operators.
- All location tracking requests identified in this operation used the Route-Record identifier *dra1.je211.epc.mnc003.mcc234.3gppnetwork.org*, attributed to the Airtel Jersey/Sure Jersey network.
- The same Origin-Host observed in the February 2025 operation has also been observed in historical location tracking operations, as reported by a mobile signaling firewall provider, dating back to 2022.

In addition to seeking a response on our findings described above, we also ask that you confirm:

- Can you confirm whether the Route-Record identifier referenced above is attributed to the Airtel Jersey/Sure Jersey network?
- Does Sure Jersey Limited use network monitoring tools to ensure the integrity of its network and that it is in compliance with GDPR laws?
- Does the Route-Record signaling identifier referenced above belong to a network node operating in the Sure Jersey Limited infrastructure? If not, then is it leased to a third party provider that uses the Sure Jersey Limited infrastructure?
- If the signaling identifier referenced above is leased to a third party provider, to which provider is it assigned?

We plan to publish a report reflecting our research. Provided we receive your response by April 22nd at 12:00 pm ET, we will publish any response you provide us in full along with our research



report. All correspondence with Airtel Jersey will be considered public and included with the final research report.

Sincerely,

Ronald J. Deibert, O.C., O.Ont.

Professor of Political Science

Director, the Citizen Lab at the Munk School of Global Affairs & Public Policy,

University of Toronto