هيئة تنظيم الاتصالات
TELECOMMUNICATIONS REGULATORY AUTHORITY
Kingdom of Bahrain - مملكة البحرين

Decision No. 1 of 2026

Decision of the Telecommunications Regulatory Authority in relation to the requirements for Roaming Services used exclusively outside of the Kingdom of Bahrain

LAD 0126 003

29 January 2026

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INTRODUCTION

This is a decision of the Telecommunications Regulatory Authority (the "**TRA**") pursuant to which it clarifies the requirements for Roaming Services used exclusively outside of the Kingdom of Bahrain.

The TRA pursuant to the powers conferred upon it by the Telecommunications Law of the Kingdom of Bahrain (the "**Telecoms Law**") has hereby issued by this decision.

Unless the context otherwise requires, capitalised terms that are not otherwise defined in this Decision shall have the same meaning prescribed by the Law and the Regulation (as applicable).

BACKGROUND

Article 3 of the Telecoms Law grants the TRA the power to issue legal instruments as may be necessary for the implementation of the Telecoms Law. Article 3 further requires the TRA to exercise its powers efficiently, effectively and reasonably in order to protect the interests of Subscribers and Users in respect of availability and provision of service.

In 2016, the TRA published the SIM-Card Enabled Telecommunications Services Registration Regulation (the "**SIM Card Regulation**"). The SIM Card Regulation was promulgated to safeguard against fraud, identity theft and related harms in the context of telecommunications services, specifically in the use of mobile telecommunications services. It requires Mobile Network Operators (the "**MNOs**'") to carry out (amongst other things) registration and verification of every subscriber to a SIM-Card Enabled Telecommunications Service through the processing of certain identification details (including the subscriber's passport and/or biometric details).

The principal aim of the SIM Card Regulation is to enhance the national security of the Kingdom in the provision and use of telecommunications services in Bahrain.

The provision and use of telecommunications services have evolved since then. MNOs and others are offering mobile communication services to people outside of the licenced territory.

MNOs issue SIM cards internationally. Most SIM cards issued today are electronic SIM cards (the "**e-SIMs**"). E-SIMs can be designated for international roaming services and can be further limited for use outside or inside a particular territory. This would mean that e-SIMs could be configured in Bahrain to be used exclusively outside the territorial jurisdiction of the Kingdom of Bahrain and do not access Bahraini networks (other than for signalling or administration and other necessary purposes).

Self-evidently, such SIMs do not provide domestic telecommunications services within Bahrain. Consequently, the application of domestic SIM registration requirements to international roaming services used exclusively outside of Bahrain does not materially advance the objectives of the SIM Card Regulation especially where the national security, personal data and consumer protection risks are not present in the same manner as for domestic services.

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In providing such services MNOs will be required to take responsibility for compliance with the laws of third countries. For instance, MNOs act as controllers in the processing of personal data of their subscribers. MNOs should bear in mind that if they offer the Roaming Service to EU citizens, for example, they will be caught by the extraterritorial application of the GDPR. Obligations including the requirement to appoint a data representative in the EU might arise. Other countries may have other requirements or conditions for the use of and provision of Roaming Services.

Considering the foregoing, and pursuant to its powers under the Telecoms Law, the TRA has issued this Decision.

Article 1
Definitions

For the purposes of this Decision, unless the context prescribes otherwise, the following words and phrases shall have the following meanings, provided that capitalized terms used in this Decision shall have the same meaning ascribed to them under the Telecoms Law and/or the SIM Card Regulation:

e-SIMs is the generic term used for the embedded form of a SIM (subscriber identity module) card.

Exclusively Outside of Bahrain means that an eSIM is used only on foreign telecommunications networks located outside the territorial jurisdiction of the Kingdom and does not originate telecommunications traffic in the Kingdom.

Facial Recognition Requirements Document refers to the document published by the TRA on 8 February 2024 which aims to enable mobile network operators to comply with their obligations under Article 7 of the SIM Card Regulation.

IMTL refers to an Individual Mobile Telecommunications Service Licence.

MNOs refers to all Licensed Operators who are in possession of an IMTL.

Roaming Services means international mobile telecommunications services provided using eSIMs issued by licensed operators in the Kingdom which operate exclusively on foreign networks outside of Bahrain and in accordance with Article 2 of this Decision.

SIM Card Registration Regulation means the SIM-Card Enabled Telecommunications Services Registration Regulation promulgated on 27 December 2015 as may be amended from time to time.

Telecommunications Law refers to Legislative Decree No. 48 of 2002 promulgating the Telecommunications Law of the Kingdom.

TRA refers to the Authority.

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Article 2
Scope

1. The TRA hereby determines that insofar as the provision of the Roaming Service, the Registration, Verification and Activation requirements under the SIM-Card Registration Regulation do not apply.

2. The determination stipulated under the preceding sub-article will apply exclusively to eSIMs that are:

   i. issued by MNOs;

   ii. are technically configured and restricted for use solely on foreign networks outside of the Kingdom;

   iii. not active in the Kingdom save to the extent of activation and control; and

   iv. the Roaming Service is limited to data services. For the avoidance of doubt this means (i) the e-SIMs cannot send or receive SMS or similar handset/network facilitated messaging services with the exception of Emergency Warning Messages enabled by Cell Broadcast Technology; and (ii) cannot make or receive voice calls.

3. For the avoidance of doubt, the Registration, Verification and Activation requirements under the SIM-Card Registration Regulation will remain applicable to:

   i. any SIM Card used, whether permanently or intermittently, on networks located within the Kingdom of Bahrain (including where a user of an e-SIM originally issued for the purposes of a Roaming Service subsequently opts to use the e-SIM in the Kingdom (such as by way of illustration in the case of using a GCC Bundle) and in which case MNOs must comply with the requirements of the SIM Card Regulation including the Facial Recognition Requirements Document);

   ii. any SIM-Card Enabled Telecommunications Service provided, used or accessed within the Kingdom; and

   iii. any SIM-Card Enabled Telecommunications Service accessible to end users physically located within the Kingdom.

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Article 3
Ensuring compliance

In order to ensure compliance with this Decision including that a SIM-Card Enabled Telecommunications Service qualifies under Article 2 of this Decision, MNOs shall:

i. implement appropriate technical measures to ensure that the relevant eSIMs are used Exclusively Outside of Bahrain;

ii. for eSIMs that are to be used Exclusively Outside of Bahrain and therefore to qualify under Article 2, employ a number range that is exclusively dedicated to such use and which cannot be used or seen by the Subscriber;

iii. maintain accurate and up-to-date records and documentation to demonstrate to the satisfaction of the TRA and/or national security organs that all those eSIMs issued by MNOs to be used Exclusively Outside of Bahrain have been and continue to do so;

iv. respond in a timely manner and within the timeframes indicated to any request for information by the TRA and/or national security organs including (without limitation) information on the user of the Roaming Service and information related to the user's geographic location;

v. promptly notify the TRA of any change to any eSIM that may affect its qualification as an eSIM which is used Exclusively Outside of Bahrain and take any action as may be directed by the TRA including the disconnection of that eSIM;

vi. identify traffic from Roaming Services separate from other traffic; and

vii. ensure that eSIMs that are to be used Exclusively Outside of Bahrain can only be used for a limited period of time that does not exceed ninety days.

Article 4
International obligations

MNOs shall ensure compliance with international obligations that arise out of the provision of the Roaming Service. Specifically, MNOs are uniquely responsible for ensuring that the Roaming Service complies with all applicable laws, rules and regulations that may apply wherever the service is provided. MNOs may not represent that Roaming Services are standard Bahraini mobile subscribers roaming internationally.

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Article 5
Review

The TRA reserves the right to review this Decision and make any amendments it deems appropriate in light of any changes to the Law, and/or the Regulation and/or the IMTL and/or as a result of international obligations and/or market conditions.

Article 6
Entry into Force

This Decision is effective as at the date of its issuance.

Philip Marnick
General Director

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