



CNMC Alias Registration in Spain (SMS & RCS)

LINK MOBILITY SPAIN

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SenderID registration for the Spanish market.

From June 2026, alphanumeric sender IDs (aliases) used in SMS and RCS messages to Spanish phone numbers will be subject to new regulations. This regulation introduces a **mandatory National Alias Registry**, overseen by the National Commission on Markets and Competition (CNMC), with the aim of reducing fraud, identity theft, and the misuse of brand identities in messaging channels.

Therefore, **any organization using alphanumeric Sender IDs** to communicate with Spanish telephone numbers **must ensure that these aliases are properly registered** and that the service provider used for sending messages is authorized to handle them. **Failure to comply with these requirements will result in the blocking** of messages to Spanish numbers once the blocking obligations come into effect.

This document is intended for companies, brands, and organizations that send SMS, MMS, or RCS messages with alphanumeric aliases to numbers in Spain. Its purpose is to provide a clear and practical overview of the new framework, detail who is affected and what the operational implications are, and offer guidance on how to prepare in advance to minimize the risk of service disruption.

LINK Mobility assists its clients in this transition by supporting them in managing alias records, relevant authorizations, and compliance controls, thus helping to ensure a smooth implementation of the new requirements and the continuity of messaging services in Spain.

Legal notice and scope of this document

This document is for informational purposes only and does not constitute legal advice.

The content is based on Circular 1/2026, of March 18, from the National Commission on Markets and Competition, which regulates the Alias Registry, Order TDF/149/2025, of February 12, and the associated official documentation published by the CNMC for the implementation of the Alias Registry. It also reflects the final regulatory framework in force as of the date indicated on the cover.

This document offers a practical and executive overview of the applicable framework, without replacing a detailed review of the corresponding regulations and official documentation.

Executive Summary

The Spanish regulator (CNMC) has approved a mandatory **National Register of aliases for SMS/RCS messages** sent to Spanish numbers. This new framework regulates the use of alphanumeric sender identifiers and sets **June 7, 2026**, as the effective date for the obligations associated with its compliance.

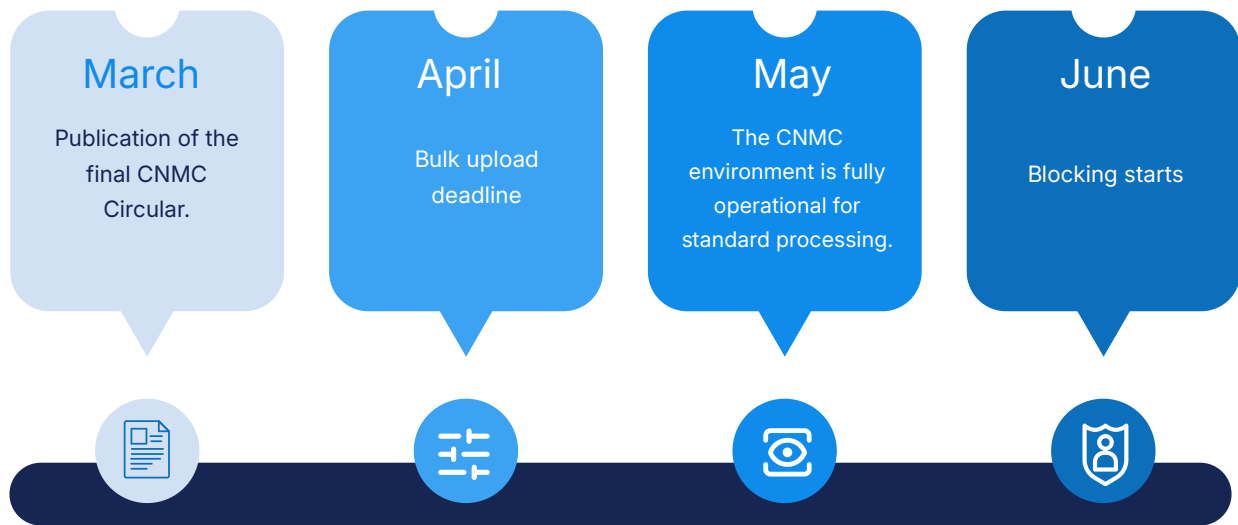
Businesses sending SMS or RCS messages in Spain must comply with these regulations. **Failure to comply with the new regulations will result in the blocking of SMS and RCS messages** sent to Spanish numbers.

LINK Mobility Spain, a leading messaging provider, actively participates in all discussions with regulatory authorities and other stakeholders, in order to **support its customers in a smooth transition** to the new regulatory framework.

The key rule is simple: If a message uses an alias, it must be registered and linked to an authorized provider, otherwise, it will be blocked.

Key Dates

- **March 27, 2026:** publication in the BOE of Circular 1/2026 of the CNMC.
- **March 27 - April 28, 2026:** Period enabled for the bulk pre-loading of existing aliases into the Alias Registry. This transitional mechanism allows for the incorporation of existing aliases into the initial regularization process.
- **May 2026:** New aliases or subsequent changes must be processed through the ordinary procedure, and during the initial 6-month transitional period, the CNMC may take up to 3 months to validate and register aliases.
- **June 7, 2026:** entry into force of the obligations to block messages with aliases not registered or not processed in accordance with the Registry.



Impact on customers

- **Planning:** It is essential to inventory the aliases, prepare the necessary documentation, and process the necessary registrations and authorizations to avoid blocking messages.
- **Transparency:** The CNMC will provide a public portal to check registered aliases.
- **Additional obligations:** Retention of information and submission of an annual report by the obligated parties, such as LINK Mobility.

LINK Mobility accompanies its clients throughout the alias registration process, leveraging its local team in Spain to ensure a smooth and orderly transition, as well as continued regulatory compliance.

1. Alias registration in Spain



What is an alias?

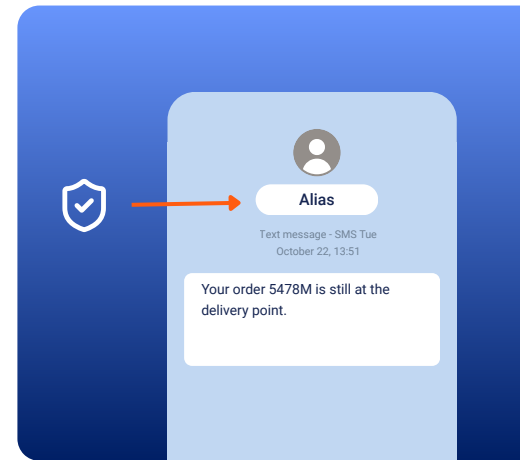
An alias is the **alphanumeric name that is presented as the sender (Sender ID) in SMS, MMS, and RCS**, such as a brand or company name, instead of a phone number.

For example: "LINKMobility", "MyBrand", "ACMESTore".



Why is this measure being implemented?

The Alias Registry is designed to safeguard both recipients and legitimate brands. By ensuring that aliases are registered and used exclusively by their rightful owners, this framework reduces phishing, spam, and fraud, thereby preserving SMS and RCS as reliable channels for business communications.



What is in scope (and what is not)?



In scope (affected): **SMS/MMS/RCS** traffic that uses an alphanumeric sender (alias).

Out of reach (not affected):

- **Traffic that uses non-alphanumeric senders**, such as national numbers, short codes, or other numeric identifiers.
- Messages **sent to non-Spanish numbers**.



Tip: If you use alphanumeric sender IDs to message Spanish numbers, you should register your aliases. If you only use numeric sender IDs or don't send messages to Spanish numbers, your settings will not be affected.

2. Actors and roles in the Alias Registry in Spain



Alias holder (company or organization)

The alias holder (hereinafter: Holder) is the company or organization that uses an alphanumeric alias in its communications. In the context of registration, the Holder is the legal owner of the alias and is responsible for its registration, accuracy, and authorized use, including verifying legitimate links and managing authorizations.



Third parties (agencies, integrators, platforms)

Many organizations use third parties (such as agencies, integrators, or platforms) to manage messaging on their behalf. Regulations allow these third parties to submit and manage alias records on behalf of the Owner, provided they have the appropriate authorization.



Key takeaway: Operational management can be delegated, but ownership and consent remain with the Owner.



Providers (LINK Mobility)

As a Provider, LINK Mobility (hereinafter, the Provider or LINK) is part of the regulated delivery chain of SMS and RCS traffic to Spain and is required to implement registration validation rules, including blocking alias-based messages that do not meet registration and authorization requirements.

Depending on the configuration of the courier service, LINK may act as a messaging platform, as a transit provider, or carry out the necessary regulatory compliance and validation checks before delivery.



In addition to its regulatory responsibilities, **LINK Mobility assists clients and partners in understanding and practically applying the framework.** With a local office in Spain, dedicated support teams, and a local compliance officer, LINK Mobility is ideally positioned to guide its clients through the alias registration process and **facilitate a smooth, compliant transition.**

3. Blocking criteria applicable to messaging with sender aliases

To send a message using an alias, **both of the following conditions must be met:**



- The alias must be registered in the CNMC's Alias Register.
- The provider must be authorized to use that alias.

If either condition is not met, the message will be blocked by the registered provider involved in the delivery chain to Spanish numbers. In practice, these checks are applied throughout the entire delivery chain (from dispatch to transit and final delivery), depending on how the route is configured.

What does this mean for customers?

- **Impact:** Messages sent using unregistered aliases or disabled sending settings will be blocked in Spain.
- **Operational requirement:** To ensure continuity of delivery, aliases used in messages to Spanish numbers must be registered and associated with the Provider.



How LINK helps: LINK Mobility assists customers in reviewing their current configuration, preparing the necessary information, and implementing the required compliance controls to avoid lockouts.

4. Alias registration procedure

Alias formatting rules and pre-checks

Before registering an alias, make sure it meets the following requirements. These checks help prevent confusion, reduce misuse, and avoid rejections or delays during the process.

The regulation defines the following requirements



- Length and composition (**from 3 to 11 characters**).



- **Allowed characters and use of spaces:** a-z, A-Z, including ñ/Ñ and ç/Ç, 0-9, spaces, and the following special characters: @, &, -, _, ., +. Consecutive spaces, leading or trailing spaces, accented characters, and aliases composed solely of numbers are not allowed.



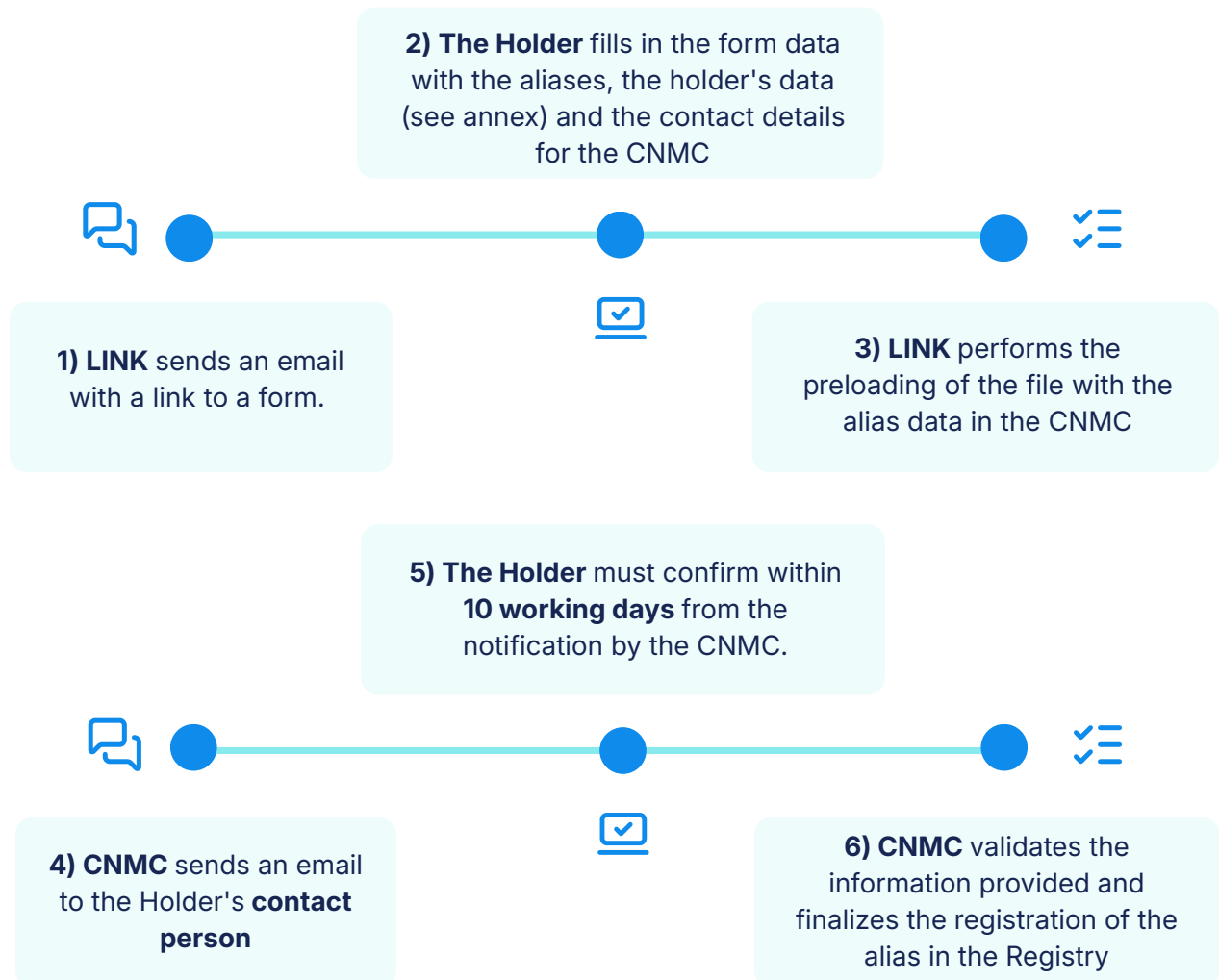
- **Common rejection reasons:** aliases may be rejected if they are generic (INFO, ALERT, BANK...), misleading, offensive, likely to cause confusion or facilitate fraud or identity theft against public bodies, companies or other entities.



- **An approved alias cannot be modified once registered.** If it is necessary to modify an alias, it must be processed as a new alias, through a new registration application and its corresponding procedure. A registered alias must be used exactly as it was registered.

Bulk upload of aliases already in use

To facilitate the transition to the new Alias Registry in Spain, the CNMC has established a **pre-loading phase for aliases already in use** until April 28, 2026. This pre-loading **reduces the risk of immediate service interruptions** and identifies active aliases in the market. The bulk upload process is only available to Service Providers.



The **details of the data** required for pre-loading can be found in the [appendix](#) to this document. The application must be authenticated using a **valid Spanish digital certificate** for the applicant or their authorized representatives.

The form sent by LINK and completed by the account holder (steps 1-3) does not replace the formal registration of the alias (steps 4-6). You must **respond to CNMC requests within the deadline, or the alias will not be registered.**


Standard registration process

Following the mass pre-upload phase, new alias registrations and subsequent changes must be processed through the **standard registration** procedure with the CNMC, via an **individual application** on its website. Unlike the pre-upload, this procedure requires the complete process for each alias. It also maintains the requirement for the account holder to provide **confirmation using a valid Spanish digital certificate** for the applicant or their authorized representatives, and the final resolution from the CNMC as essential steps in the process.

The request is **submitted by the alias holder** or an authorized representative acting on their behalf. LINK Mobility simplifies the process for its clients thanks to our experience and local team. When a third party (LINK Mobility) submits the request, the explicit approval of the alias holder will be required.

Information for preparing the application

Prepare the following information in advance to complete the application:

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- Alias requested**, in accordance with the format rules.
 - Alias Holder Details** (legal name, tax identification such as NIF or CIF, company address).
 - Representation details and notifications** (who is authorized to act and where official communications should be addressed).
 - Estimated start date and end date of use, if applicable.**
 - Selected provider linked** to the shipping configuration for that alias.

The purpose of the requested information is to prove the link between the alias and the Holder and the identification of the Provider selected for its use.

Processing times in the ordinary process

The registration process includes a defined sequence of time milestones:

- LINK Mobility submits the application through the CNMC's electronic headquarters.
- The CNMC then requests the alias holder to confirm their express approval of the application submitted on their behalf. This step must be completed within 10 days of notification by the CNMC.
- Once the express approval of the Holder has been obtained, the **CNMC has up to one month** to complete the effective registration of the alias.
- During the first 6 months after the publication of the circular, a **transitional period** until September 2026, the CNMC reserves the right to take up to **three months** to validate a sender.
- The alias cannot be used until the day after its registration in the Registry



Requests for correction (rectification)

In the event of missing information or documentation, the applicant may be required to correct the information submitted within 10 business days. If this requirement is not met within the established timeframe, the application may expire. Monitoring official notifications and responding promptly to requests are essential for the process to move forward.

5. Legitimate connection: evidence

Legitimate association is a fundamental requirement to ensure that the alias used is clearly and precisely linked to the registered owner. Its primary objective is to prevent confusing, deceptive, or fraudulent uses that could harm recipients or third parties.

What is meant by a legitimate relationship?

Legitimate affiliation refers to the ability to demonstrate, in a verifiable manner, that the requested alias has a direct and reasonable connection to the company or organization requesting it. In the registration process, this affiliation is formally declared by the Holder and must be based on a real, consistent, and verifiable foundation related to its business, identity, or distinctive signs.



How is the legitimate link proven?

The Holder must submit the corresponding **declaration of responsibility** and identify in the application the basis of their connection with the alias, thus formalizing that connection for registration purposes.



Bases of affiliation

The declaration of responsibility must be based on a legitimate relationship between the alias and the Owner, such as a registered trademark, trade name, company name, corporate domain, or other public registrations. It may also be based on the legitimate and habitual use of the alias in the entity's business activities.



Preparation of backup information

The declaration of responsibility forms the basis of this phase of the procedure. However, the Holder should have prepared any information or documentation that may support the declared connection, should the CNMC deem it necessary to verify it in more detail.



Common reasons for rejection and how to prevent them

Generic or imprecise aliases

Aliases such as "InfoSMS", "Offers" or "Support" are not linked to a specific entity and may be confused with other organizations.



How to avoid it: Use aliases clearly related to the corporate identity.

Aliases that appear fraudulent or related to identity theft

Aliases that replicate recognized brands or entities without authorization may be considered an attempt to deceive the recipients.



How to avoid it: Do not use names that could be linked to third parties unless you have the proper authorization.

There is no reasonable connection to the name or identity of the Holder.

If the alias does not come from the company name, trademark, domain, or recognized public identity, it is likely to be rejected.



How to avoid it: Make sure the alias clearly represents the legitimate ownership of the sender.

Use of characters or formats not allowed

Aliases that include special symbols, ambiguous abbreviations, or unconventional formats will not be accepted.



How to avoid it: Comply with the regulator's rules and guidelines regarding authorized alphanumeric formats.

6. Alias lifecycle and provider responsibilities



Alias lifecycle

Once registered, the alias can be used in compliance with the regulations. The owner can specify an activation date and, if desired, an end-of-use date. If no end-of-use date is specified, **the alias will be valid indefinitely.**



Suspension and reactivation

A registered alias may be suspended at the request of the Owner if it remains unused for twelve consecutive months or, if specified, at the end of its usage period. The CNMC may also agree to its temporary suspension in case of misuse. During the suspension, the alias will no longer appear as active in the Registry and messages using it may be blocked. The Owner, or LINK Mobility on their behalf, will have one month to request its reactivation. Otherwise, the alias may be considered canceled and will be disabled for six months, without the possibility of requesting a new registration during that period.



Public Registry

The regulations include a **public consultation portal that allows users to verify the activity of an alias** and check its activation date. This mechanism promotes transparency and facilitates basic checks on the alias's status.



Operational controls and regulatory monitoring

Providers must implement the operational controls required by regulations and retain the information necessary to fulfill their monitoring and statistical reporting obligations. Among other functions, they must maintain a daily record of blocked messages and the information necessary for the annual submission of data to the CNMC.



LINK Mobility coordinates the operational lifecycle of your aliases and ensures consistent compliance with Provider controls and applicable regulatory obligations. With LINK Mobility as your messaging provider, your text senders will benefit from operational management that meets the requirements applicable in Spain.

Q & A

Is it possible to change an alias once it's registered?

No. The registered alias cannot be modified. If you need to use a different version (for example, a brand variation), it must be managed as a new alias through a new registration application. Some registration data can be updated, but the alias name cannot.

Are uppercase and lowercase letters relevant (Company vs. COMPANY)?

Yes. Variations in capitalization are considered distinct aliases. A wise strategy is to register and use the alias exactly as you intend it to be displayed.

What will the public be able to see on the consultation portal?

The regulations establish a public consultation portal to verify active aliases, including the Owner and the activation date.

How long does registration take in the standard process?

The CNMC has up to one month to complete the registration process once the licensee's authorization procedure is finalized. During the initial six-month transition period following the opening of the registries, the registration period may be extended to three months. Incomplete information may also result in additional time being granted through requests for correction.

Which aliases are prohibited?

Aliases that may cause confusion, be offensive, generic ("Message"), proper name unless it is associated with the holder, exclusively numeric, or that infringe the rights of third parties.

Q & A


Is it possible to register multiple aliases?

Yes. A Holder can register multiple aliases, especially when they are used for different purposes and there is a clear legitimate link with the Holder.


What happens if my alias is suspended?

Messages using this alias may be blocked. The Account Holder, or LINK Mobility acting on their behalf (subject to confirmation), has one month to request reactivation. If reactivation is not carried out, the account may be canceled, and a 6-month unavailability period will apply before the same alias can be requested again.


Can I use an alias while the record is "pending review"?

 No. An alias should only be used once it is registered and active.

How many aliases can be registered by the same owner?

 There is no limit, as long as the format and linking criteria indicated in the Alias Registry Circular are met.

Do foreign companies have to register aliases?

 Yes, if you wish to send messages with aliases to Spanish numbers. Aliases from unregistered foreign companies will be blocked, except when the mobile operator can verify that your subscriber is roaming.

Q & A

 **We are a foreign company. Is it possible to register an alias in Spain?**

Yes. Foreign owners can register an alias in Spain under the same regulatory framework as Spanish entities.

 **What happens if I send messages to Spain from abroad without registering my alias?**

If the recipient is located in Spain, messages using an unregistered alias may be blocked. A specific exception has been noted for certain roaming situations, where delivery may be made with the sender listed as "NOT VALIDATED" instead of the alias.

 **Can LINK Mobility register my aliases in my name?**

Yes. A Provider or a third party may submit the registration provided the Data Subject expressly approves the authorization of the request when necessary. LINK Mobility can manage the submission process and coordinate the Data Subject's authorization.

 **Is it also necessary to register aliases for RCS?**

Yes. The framework requires the registration of aliases used in RCS in the same way as for SMS, including details of the owner and the provider involved.

 **Can aliases be registered without associated official records?**

Yes, provided that the holder declares a legitimate and habitual use of the alias within their professional activity and justifies it with a responsible declaration.

Appendix

Bulk preload

Required data and formats for bulk upload

