

Reference: 01898261

Information Requests  
[information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

22 October 2024

## Freedom of Information request: Right to know request

Thank you for your request for information concerning call providers and certain complaints.

We received this request on 24 September 2024. You added further questions to your request on 4 October 2024. We have considered your request under the Freedom of Information Act 2000 (“the FOI Act”).

### Your request & our response

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*1. As a layman, I struggle to grasp the difference between “call providers” and the “major landline and mobile networks” I also cannot grasp the concept of you allocating numbers to call providers. Could you explain or send me a link to an appropriate web page. I take it you do not allocate the majority of telephone numbers as used by the major networks, rather to a specific type of call provider. What services do these specific call providers provide, if they are markedly different from the major networks? from a layman’s perspective.*

Ofcom allocates number ranges (blocks of 1000, 10,000 and 100,000 numbers) to a variety of different “communications providers”<sup>1</sup>, which will enable them to offer and provide different kinds of telecoms services to their residential and business customers.

Communications providers allocated numbers by Ofcom in this way (the range holders) are also able to sub-allocate these numbers to other providers and resellers (the sub-allocatees) or assign them to customers (that is residential or business end users, who are not themselves communications providers).

It is not clear to us in what context you have seen “call provider” and “major landline and mobile networks” terms being used but these terms do not have a specific regulatory definition, the meaning might differ depending on context. The term ‘call provider’ may refer to range holders or sub-allocatees, as described above. The term ‘major landline and mobile networks’ may refer to those communications providers who operate the largest communications networks and these network operators are very likely to be range holders.

*2. How many complaints in the last five years has Ofcom received complaints about nuisance, silent or discontinued calls from numbers allocated by Ofcom to call providers? I appreciate under the FOI, and the communications Acts you are exempt from passing on details linked to specific businesses, so I have not listed any company names or actual numbers.*

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<sup>1</sup> The regulatory definition for this term can be found on 76 of [General Conditions of Entitlement Unofficial Consolidated Version 1 Oct 24](#)

Please see the complaints number for silent and abandoned calls (which constitutes the nuisance calls data we collect) per year, for the last five years below.

Year	2020	2021	2022	2023	2024**
<b>Total complaint numbers</b>	25342	29633	9700	8284	6265 (**data correct until the end of September)

3. How does Ofcom identify who (if it is not the call provider the number was originally allocated to) is “generating” reported nuisance, silent or discontinued calls, when the numbers allocated by you can be sub allocated by the call providers to third parties, my understanding is that you are unaware if, and to whom the sub allocation is made, is this the case?

There is a complex distribution chain for telephone numbers. As explained under question 1 above, we allocate large blocks to communications providers, i.e. range holders, who then give the numbers to their customers so that they can provide a variety of services. Their customers can include other providers, resellers and end users.

Our records show the communications provider that has been allocated the numbers. We generally have no visibility of how those numbers are then distributed, and therefore we do not know all the providers using numbers.

However, we have set rules on how numbers may be used by providers to ensure, among other things, adherence to the UK’s National Telephone Numbering Plan<sup>2</sup> and that numbers are not misused, for example see our rules under General Condition B1<sup>3</sup>. We have also issued a “Good Practice Guide”<sup>4</sup>, which sets out steps we expect all providers to take to ensure they comply with certain obligations under General Condition B1<sup>5</sup>, including their responsibilities when giving their numbers to sub-allocatees.

In cases where misuse is suspected or reported to us, we may contact the communications provider the number is allocated to for further enquiries and this may include enquiries about who the number/s have been sub-allocated to. Ofcom has the power to open an investigation into the communications provider if we suspect that they have failed to follow the rules and where appropriate. Our decisions about taking enforcement action are informed by Ofcom’s regulatory enforcement [guidelines](#).

We currently have an open enforcement programme looking into compliance with our rules relating to scams: [Enforcement programme into phone and text scams](#) and [Ofcom launches investigation into whether Tismi failed to prevent misuse of its phone numbers](#). We have also taken action in the past relating to silent and abandoned calls: [Enforcement programme into silent and abandoned calls](#).

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<sup>2</sup> [The National Telephone Numbering Plan](#)

<sup>3</sup> [General Conditions of Entitlement Unofficial Consolidated Version 1 Oct 24](#)

<sup>4</sup> [Good practice guide to help prevent misuse of sub-allocated and assigned numbers](#)

<sup>5</sup> Obligations under General Conditions B1.6, B1.8 and B1.9

*4. Who does Ofcom hold responsible for reported nuisance, silent or discontinued calls, made from numbers allocated by Ofcom to a call provider? Are you able to identify if the number has been sub-allocated, and to whom it has been sub allocated to, or do you hold the original call provider the number was allocated to responsible.*

Please see our responses to the questions above.

It is ultimately the responsibility of the communications provider to whom the number ranges have been allocated to ensure that their sub-allocatees are following the general rules. Where the number has been suballocated, we may contact the communications provider to understand the processes in place to ensure customers are protected. The communications providers will advise Ofcom who the number has been suballocated to and may remedy the issue. However, if we are not satisfied by their response and suspect that the policies are not sufficient, we may take further action. This may be through compliance remediation or opening an investigation.

*5. My understanding is that you issue guidance notes to call providers on who it is appropriate to sub allocate telephone numbers too. How many times in the last five years has a call provider been “found guilty” (my phrase as I do not know the technical term - I do not mean by a court of law, rather yourselves), of sub allocating a number to an inappropriate third party?*

Ofcom do not adjudicate on whether a third party is ‘inappropriate’. However, we have rules in place aimed at preventing misuse of numbers (e.g. General Condition B1) and we also require range holders to ensure their customers (e.g. sub-allocatees) follow the rules. As explained, we also have issued a “Good Practice Guide”<sup>6</sup>, which sets out steps we expect all communications providers to take to ensure they comply with their obligations<sup>7</sup>, including their responsibilities when giving their numbers to sub-allocatees, such as carrying out due diligence checks each time numbers are sub-allocated or assigned to a new or existing business customer. You may wish to have a look at the Good Practice Guide and the accompanying statement<sup>8</sup> for further details.

Any enforcement activity that is commenced considers whether the communications provider has acted in accordance with the relevant legislation and General Conditions.

Ofcom publishes all its investigations, including decisions, on our website: [Enforcement - Ofcom](#)

In the last five years, we have opened one investigation relating to alleged misuse of telephone numbers. This investigation is still ongoing. See this page for further information: [Investigation into Tismi’s compliance with its obligations under the General Conditions of Entitlement \(GCs\)](#).

*6. This is a very general question regarding trends - has there been a change in the balance of the number of complaints about nuisance calls made between landlines and mobiles in the last five years? From my Introductory paragraph you will understand why I ask, and the general concept I am trying to obtain information on. I leave it to you how best to interpret my request.*

Mobile and fixed line (landline) complaints are largely filed under ‘telco unrelated’, so we do not distinguish between mobile and fixed complaints and therefore we do not hold this information.

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<sup>6</sup> Good practice guide to help prevent misuse of sub-allocated and assigned numbers. This guide was issued off the back of General Conditions B1.6, B1.8 and B1.9.

<sup>7</sup> Obligations under General Conditions B1.6, B1.8 and B1.9

<sup>8</sup> Statement: Good practice guide to help prevent misuse of sub-allocated and assigned numbers

On 4 October 2024 you asked the following questions, which we have provided answers to:

*7. In particular you do not highlight on your website the fact that the numbers allocated to call providers can be accessed, and that the public could use these lists to possibly identify the source of silent calls, and the company they have been allocated to? Can you show me the way the public can navigate through the website to find Downloading numbering data. For instance on the web page under silent and abandoned calls, you do not mention that this data is available.*

Ofcom has a dedicated page on its website for number allocations located here: [Download numbering data.](#)

Whilst the information can be used by the general public, the main function for the data is to inform network operators and communication providers, about each range along with the number allocatee. This helps to ensure that telecom networks allow calls to be made to and from each number range.

Ofcom updates its numbering data each week; communication providers and network operators will extract the excel and CSV formatted documents direct from our website into their own systems for numbering activation purposes.

Please also see our explanations under question 8.

*8. I now know that you can manipulate the data on excel, but for instance when I try and look up the numbers that you identified with Twilio I cannot find them. so I tried looking up 0151 4532023, and enclose the web page I expected to find it on It appears you never show the 0 at the start of the number on line 1521, I find 1514 53 in Line A and in Line D I see 3+7 but not the actual number I was searching for.*

As we previously mentioned, Ofcom allocates its numbering in block sizes of 1,000, 10,000 and 100,000 so whilst individual numbers will not be easily identifiable from the data, you can work out the information from the first set of 5, 6 or 7 digits not including the leading zero digit.

We have provided a table below to help you understand the main parts for the numbering data.

The first column shows how the range appears in the numbering spreadsheets. The second column demonstrates how the range is broken down to feature all the numbers that form part of the range, whilst the final column indicates the range holder.

<b>Number Range</b>	<b>Number Breakdown</b>	<b>Range Holder</b>
7878 8	07878 800 000 to 07878 899 999	Hutchinson 3G UK Limited
1514 53	0151 453 0000 to 0151 453 9999	Twilio Ireland Limited
1522 46 1	01522 461 000 to 01522 461 999	Twilio Ireland Limited

We hope this information is helpful. If you have any further queries, then please send them to [information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk) – quoting the reference number above in any future communications.

Yours sincerely,

Information Requests

**Request an internal review**

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team ([information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)) to request an internal review.

**Taking it further**

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).