

Verizon Response to Ofcom's call for input on options to address mobile spoofing

I. Introduction

Verizon UK Limited (“**Verizon**”)¹ welcomes the call for input² from the Office for Communications (“**Ofcom**”), seeking the industry’s views and evidence on the effectiveness, costs, risks, and timescales of different technical solutions to tackle scam calls from abroad which spoof UK mobile numbers. The views expressed are specific to the UK market and its regulatory regime and should not be considered as an expression of the views of Verizon in other jurisdictions where the market and regulatory environments may differ from those of Ireland.

Verizon supports Ofcom's overall objectives and we welcome the regulator's pragmatic and efficient approach. As an international gateway operator (“**IGO**”), we are keen to see the development of harmonised solutions that could have a positive impact in the short term. However, we are very concerned about the potential cost and the challenges that fixed communication providers may face in designing and implementing certain solutions identified by the regulator.

II. Verizon view on the solutions identified by Ofcom

Implementing a direct network-based solution presents significant challenges as many IGOs do not have the technical capacity to interface with a mobile carrier’s roaming database. Given the scale of the required investment, it could stifle innovation and require a lengthy timeline for implementation.

Any solution heavily dependent on IT development risks becoming disproportionately burdensome for smaller operators with low voice revenues, especially if each stakeholder is required to independently invest in, design, and implement their own solution. This would also necessitate the re-prioritisation of internal resources.

With the continued roll-out of CAMEL and VoLTE networks, Verizon does not expect IGOs to see any legitimate mobile calls on their international gateway in the future. We therefore consider that the cost of designing, implementing and maintaining a “roaming check” solution would be unnecessarily expensive for the limited benefits it would bring.

As such, Verizon considers that the simplest and most effective solution to reduce the impact of mobile spoofing would be for IGOs to anonymise the mobile CLI. For example, if a call using a “+447” CLI entered our UK international gateway from another country, providers

¹ Verizon UK Limited is part of Verizon Communications, one of the world’s leading providers of technology and communications services. Outside of the United States, the company provides a broad range of global communications products and enterprise solutions predominantly to large business customers.

² Ofcom call for input on options for addressing scam calls from abroad which spoof UK mobile numbers - dated 29.07.2024 - <https://www.ofcom.org.uk/phones-and-broadband/scam-calls-and-messages/call-for-input-options-to-address-mobile-spoofing/>



would hide the CLI so that the UK called party sees an anonymous call. None of these calls would be blocked. This will not require lengthy and complex developments and could provide an effective solution in the short term by enhancing customer protection.

In the longer term, with mobile calls being shifted to VoLTE and mobile operators setting up CAMEL Home routing for non-VoLTE calls, IGOs would be able to configure their international gateways to bar any "+447" CLIs trying to enter the UK network.

As an alternative, Verizon would suggest building an interconnect from our International Gateway to *one* of the UK mobile service providers (thereby avoiding the complexity of building out to all mobile service providers in the UK). We would send that mobile service provider any call which is entering the UK with a "+447" CLI and ask that mobile service provider to work with all other mobile service providers to screen the calls and onward route it if it passes screening. It would be the responsibility of the mobile service provider to block any call that fails screening.

In addition, Verizon would also request that Ofcom consider the impact of any call screening to the Universal International Freephone Number ("UIFN") product.³ UIFN is an international freephone number (country code +800) that can be dialled from dozens of countries.

Generally speaking, a caller makes a free international call to a UIFN number. That call is then routed over the international network to the platform of the carrier responsible for that specific UIFN number. That carrier would then route (or forward) the call to a destination number anywhere in the world.

In the case where the caller is dialling from a UK mobile number and the UIFN destination number is also a UK number - these calls would be blocked by the proposed screening. The calls would be blocked because the IGO/Mobile Service Provider would see an incoming call from international but would also see that the UK mobile caller is not roaming. UIFN providers do not always have direct connectivity into the terminating countries so could not "long line" these calls. Given this, Ofcom should ensure it considers the potential impact on UIFN as part of its further analysis.

In any case, whatever direction Ofcom follows in response to this call for input, we would strongly invite Ofcom to ensure that providers will have sufficient time to design, test and implement the solution identified by the regulator, should it determine that an intervention is necessary.

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³ More information on UIFN numbers can be found on the ITU's webpage: <https://www.itu.int/en/ITU-T/inr/unum/pages/uifn.aspx>. A list of carriers hosting UIFN numbers can also be found on the ITU's webpage: <https://www.itu.int/en/ITU-T/inr/unum/Pages/uifn-service-provider.aspx>

