

Consultation response form

Your response

Question 1: What are your views of the use of CLI authentication to improve the accuracy of CLI information presented to an end user, in particular the viability and timeframe for implementation? Are there any issues associated with implementation?

Confidential? – N

Observations

First Orion has constructed the following set of observations.

First Orion is not unknown to Ofcom, we are a company that specializes in the eradication of the nuisance call problem. We are currently deploying our solution in a number of carrier networks world-wide and would refer Ofcom to T-Mobile in the USA as to the success that can be had when using our solution.

At T-Mobile USA our solution is deployed using a technique of finger printing, and utilizing a layer 2 traffic mirror in order to extract statistically meaningful data about scam and nuisance calls. Using this big data approach to scam identification, T-Mobile is now successfully identifying and providing warning to their customers of on an hourly average of 999,990 calls in every 1 million.

We also would refer Ofcom to Canada where the Consortium of Canadian Operators is also working towards providing such a big data analytical approach on a national scale, providing a scam and nuisance call solution no matter what network the consumer is using. We will provide observations about carriers independently blocking calls later.

The issue of the unreliability of CLI is indeed an issue that First Orion commends Ofcom on trying to address, the provision of a reliable indication of CLI, i.e. the removal of spoofing from the network, would indeed be of great benefit to the consumer. The scam call industry is a multi-billion pound industry, engulfing the whole globe. The introduction of VoIP and the introduction of vulnerabilities into CLI has created a big issue for consumers across the globe. Today a consumer cannot be sure about who is calling them for any call. A CLI may be a good CLI for one call, and may be a bad CLI for another call. That is, it is not the CLI that is

good or bad, but rather the person making the call.

STIR activities and the US SHAKEN framework has made great progress around attestation of CLI. As Ofcom are aware, operators in the US are actively testing SHAKEN using the ATIS testbed provided by Neustar, however, they have very quickly come to the conclusion that STIR is not a silver bullet. Even with STIR the consumer will receive calls where the CLI is attested that are nuisance and scam calls. Consumers will also receive unattested calls or unsigned calls that are good calls, and some that are bad calls. STIR on its own does not solve the problem. Operators in the US, who already have deployed some scam and nuisance call protection for their consumers based on big data analytical techniques are instead using STIR as a source of data for an indication of the intent of the calling party. However, they realize that other sources of data are required (such as the finger printing at T-Mobile) in order to protect consumers. Indeed it would be very dangerous to inform consumers that SHAKEN has now solved the problem of scam calls, and that if they observe an attested call (maybe with the big check mark), that it is safe to assume that you are indeed talking to the person that is represented by that CLI. That is indeed a falsehood. Returning now to the consultation on CLI that Ofcom has presented. The proposals will close down some of the areas that the fraudulent callers utilize today in order to spoof calls. It will also, and perhaps more importantly make it easier to trace where bad calls came from, which is also one of the primary benefits of STIR. One has to consider, however, that this will not solve the problem of scam or nuisance calls, and if that is the intent of the change then we believe that additional provisions need to be made. Unfortunately, scam calling is not going to go away, the business is too lucrative to do so. The genie was let out of the bottle with VoIP, and these provisions alone do not put it back in.

First Orion recommend that alongside these guidelines for CLI, that UK Operators under Ofcom's guidance look at the scam and nuisance call issue from a holistic view, and take into account moves in the USA and Canada

to provide consumers protection using big data analytical techniques. We point to the success of these techniques on a large network in the USA run by T-Mobile. T-Mobile are happy to attest to their success, and also happy to consult on how it was achieved. Success of only allowing 10 in every 1 million scam calls to be delivered to the consumer without a warning as to it's nature is a level of protection that will not be met with purely implementing the CLI guidelines as presented.

First Orion provides some point by point responses below, but our summary view is that these guidelines themselves will cause the Operators a lot of busy work to implement, particularly on some of the legacy equipment upon which I am sure they never expected to have to change before going EOL, but will not have the desired effect of preventing the scam or nuisance call issue. They may cause the Scam callers some temporary issues, and cause them to change tactics. They may allow some scam callers to be prosecuted through the traceback provided, all of which is good, but we encourage Ofcom to think more broadly about a complete solution, and to recognize that it is not CLI that is good or bad, but the person that is on the other end of the call. First Orion would welcome participating in any working group taking an holistic view of Scam and Nuisance calls in the UK market.

Consultation Comments

The following are comments on the points of the consultation

3.3 b Anonymous Call Rejection today is unusable for most vulnerable people that wish to use it as many useful calls come through with CLI withheld. Namely NHS calls withhold CLI for privacy purposes, and as such, the vulnerable, who have a high probability of receiving calls from doctors etc. cannot use this service. We recommend that users are given the control to block scam calls. However, there is not a direct correlation between scam callers and withheld numbers.

4.9 First Orion has concerns about the availability today of a centralized database that maps the contractual owner of a CLI. Where wholesalers have been allocated number

ranges, and where each of those numbers can be traced to the owner. This assumes all LNP data is consolidated and updated also. Who will undertake and own this particular database?

4.10 Transit CPs currently do not have any idea of the CLIs they are passing. Is this feasible for all transit CPs to comply, and given that many of these lie outside of Ofcom's jurisdiction, will this have any tangible effect on scam/nuisance calls?

4.12 First Orion has a concern about transparency. How will a consumer know where to go to if they are not receiving calls that they deem that they want? If all CPs are blocking calls, some at origination, some in transit, and some at termination, the understanding of who blocked what where and why becomes unmanageable.

4.13 First Orion assumes that as this section refers to the diverting of calls to a mail box that this is only applicable to the terminating CP. We also do not recommend the practice of sending scam calls to voicemail. This actually presents scammers with an opportunity to present their story, so in some cases will still expose a vulnerable (in this context vulnerable is equated to susceptible) person to the scam. We also feel that voicemail is a dying technology, not used by younger generations, and therefore a short lived solution. We would recommend either scam marking (the indication that a call is a scam), scam blocking as an opt-in service, but with a call log so that users can review their call history including what has been blocked on their behalf.

4.15 This indicates that if a CLI is unreliable then it should be marked as unavailable. Does this suggest that all the following calls would be presented to the end user with unavailable CLI? CLI guidelines if it only applies to the UK country code:

- Any call from a UK mobile which is roaming outside the UK made to a UK number will not have the correct CLI
- Any call made from outside the UK from a call center making calls on behalf of a UK Company will not have the correct CLI
- Possibly any call made from any UK roamer (inside or outside the UK) will not have the correct CLI

	<p>CLI guidelines if it applies to any country code:</p> <ul style="list-style-type: none"> • Any call made from ANY number outside the UK to a UK number will not have the correct CLI • Any call made from a non-UK number from inside the UK to a UK number will not have the correct CLI • Possibly any call made from any roamer (inside or outside the UK) will not have the correct CLI <p>If our interpretation of these guidelines is that each of the above statements is true, then we feel that they are removing information that may be useful to the consumer. Providing no information surely is not better than providing some. This would mean that for many calls the calling party would be a good party, but be marked as unavailable, making the mark of unavailable not something that an end user could use to decide whether to answer, or to determine if they are a good or bad caller.</p>
<p>Question 2: Do you have any comments on the proposed changes to the CLI guidelines?</p>	<p>Confidential? – N</p> <p>First Orion provided a full response to question 1. We would recommend that Ofcom takes a more holistic view of the scam and nuisance call problem in which First Orion would be happy to take part, and provide our view of global solutions to this problem. We embrace activity to enhance traceback which helps enforcement, and also any initiative that reduces the ability of bad actors to spoof numbers. However, it has to be recognized that the CLI enhancements alone will not in any way stop the problem of scam and nuisance calls, and if Ofcom wishes to truly do that, then more is needed to be done.</p>
<p>Question 3: Are there any other types of Presentation Numbers which could be added to the list in Annex 1 of the CLI guidelines?</p>	<p>Confidential? – N</p> <p>First Orion do not have a view on this subject</p>
<p>Question 4: Do you have any comments on the</p>	<p>Confidential? – N</p>

proposal to designate the 08979 number range as 'Inserted Network Numbers for Calling Line Identification' in the Numbering Plan?

First Orion backs fully any initiative to enhance traceback and enforcement activities.