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

Nexbridge supports Ofcom's view that CLI information needs to provide accurate information about the calling party. With the significant move of CPs to IP based technologies, there is a significant risk with regard to CLI spoofing, mis-formatted CLIs, missing CLIs, etc. We would suggest that any Network or Presentation CLI that routes through a CPs network (whether originating directly via connected customers, or via transit) is checked (via in-call lookup) to ensure that the CLI is from a number range that is allocated to a range holder, and not having a status of "protected" or "unallocated" in Ofcom numbering lists: is of valid formatting and is available if from overseas.

There is a lar**ge market where a rangeholders'** telephone numbers are sold, often via reseller businesses, for use on another network. This causes confusion when identifying the originating CP, and will result in inbound calls to the number being routed to the range holder who may not route (or even be aware) that the call needs to be routed to the calling party **–** especially if a call centre. Multiple layers of resellers with multiple sub-allocations has, whilst improving competition, created a numbering environment that is extremely difficult to police. Use of geographic numbers in an IP network is also not always representative of the location of the caller due to technological reasons (e.g. no local physical telephone exchanges hosting local numbers) as Ofcom recognises, and Nexbridge welcomes additional methods (e.g. STIR) to aid in more easily identifying call origin and accuracy.

Implementation of CLI checking within an IP network (subject to accurate number range allocation information being maintained), would be relatively easy to maintain via database lookups during call setup/delivery. This may not be the case for legacy TDM networks however. |
| Question 2: Do you have any comments on the proposed changes to the CLI guidelines? | Confidential? – N
Nexbridge agrees that CLIs must be correctly formatted, presented in line with privacy markers, and must be diallable for called parties to return calls to the CLI presented to them, and at a low rate charge. As noted in the response to Q1, use of a CLI not allocated by the OCP is currently very difficult to police in practice, and Nexbridge would question the validity of a calling party using a CLI for presentation purposes that is not provided by the OCP itself. A telephone number (Geo/UK Wide/etc) can be purchased online relatively easily, and the proof of authority of allocation of that number to the user of the number can often be provided via an invoice from the providing reseller. If this number is used on another CPs network, that CP cannot verify the ability for an inbound call to be serviced, as the return call will not be received on its network. If the **number is to be used on a network that is not the rangeholder's (or current CP's), then that number should be ported via number portability to** the network on which the customer resides.

Nexbridge does not allow its customers to use its numbers on another **party's network unless that number is exported via number portability, and** believe this situation should be enforced to allow the CP routing the outbound call to also police the use of the inbound call. This helps to reduce spoofing of numbers off-net, but is obviously not foolproof should an unscrupulous company simply pick a number from a range within an Ofcom list. |

	Whilst Nexbridge welcomes proposed measures to address misuse of **telephone numbers, Ofcom's proposal to potentially withdraw a rangeholder CP's entire number range(s) due to potential misuse has an** adverse effect on genuine users of numbers in a range, however will obviously encourage a rangeholder CP to comply to address non-compliance within that range. Unfortunately, should Ofcom decide to withdraw a range due to no response from a rangeholder CP, any numbers that have been exported via number portability from the range(s) being withdrawn to a gaining communication provider (GCP), will also be disconnected by virtue of the number range being withdrawn. Nexbridge agrees with the principle of introducing CLI Guidelines into the General Conditions however.
Question 4: Do you have any comments on the proposal to designate the 08979 **number range as 'Inserted Network Numbers for Calling Line Identification'** in the Numbering Plan?	Confidential? – N Nexbridge supports the introduction of a number range to ensure that invalid overseas originated CLIs can be identified as such and can be routed appropriately, blocked by consumers or traced to the CP that first receives the overseas call into the UK.