

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?

We cannot comment on the implementation of a proposed STIR standard, or timeframe thereof, until it is a ratified standard and the final report has been produced by the NICC.

However, we support the principle of CLI authentication and already implement measures on our own network to reduce the misuse of CLI including preventing presentation of invalid caller ID, and flagging invalid caller ID on inbound calls to customers as well as providing a means allowing them to block such calls, that would comply with 4.18 of your proposal.

Question 2: Do you have any comments on the proposed changes to the CLI guidelines?

We fully support changes to CLI to curb the persistent misuse of this service and reduce the risk of consumer harm.

The requirement for CPs to “verify that the caller has permission to use the CLI in a call” with respect to a Presentation Number is more complicated. One legitimate use case of (Type 4) presentation numbers by many of our customers is call-forwarding;

For example, an inbound call to a corporate PBX from a mobile reaches an employee’s desk phone which is configured to forward that call to an employee mobile when they are out of the office. It is reasonable for the corporate PBX to present the mobile number as a Presentation Number (and reflects the true identity of the caller) but it is impossible for us at the wholesale service provider to know that this use is authorised beyond that agreed in a contractual obligation with the customer.

Furthermore, whilst it may fall outwith the scope of this consultation, the use of the Network Number alone to provide location information to the emergency services is outdated and primitive and has failed to evolve with modern technology such as VoIP based services – many VoIP users are truly nomadic, and customers raise concerns about submitting address data for this purpose. With IP based connectivity it seems reasonable that location information could be provided within the signalling (either in address format, or data from embedded GPS within the calling party device) alternatively address data could be maintained by the CP in a more agile manner than the current submission to BT Calypso, and could be queried by an agreed interface specification (e.g. secured API) by the emergency services where required.

Question 3: Are there any other types of Presentation Numbers which could be added to the list in Annex 1 of the CLI guidelines?

No

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?

We would support the use of 08979 number range in this manner although would suggest that, rather than requiring registration where in the example XX denotes the CP, that the existing CUPID (which already uniquely identifies a CP) is incorporated within the number, thus aiding identification amongst CPs.