

Consultation response form

Your response

<p>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?</p>	<p>Confidential? – N</p> <p>In principle we would welcome improvements to CLI authentication, we have suffered serious reputational and financial damage as a result of spoofing activity.</p> <p>The viability and timeframes involved are difficult to comment on until we have more information from the STIR project. We would want to see draft technical standards prior to their being implemented in order to ensure that they were viable and can then also judge how long is need for implementation.</p> <p>Pending this we do not believe the technology in use by most UK CPs is capable of making the changes in real time or at all where VOIP is involved. VOIP calls do not carry all the flags that would be needed to implement these changes. Overseas CLI, even within the EU, vary so much in format that it would be almost impossible to identify in real time what is dialable and what is not. Attempting to implement the changes would cause serious quality of service issues and possibly network congestion.</p>
<p>Question 2: Do you have any comments on the proposed changes to the CLI guidelines?</p>	<p>The suggestion that presentation CLI are not a number that results in charges in excess of the cost of a standard telephone call to a geographic or a mobile number is acceptable but we would want 03 numbers included in that list.</p> <p>We also have concerns over 4.17. Lists of sources that might reasonably suspected to carry nuisance traffic are not available to all</p>

	<p>Terminating CPs, either because they are not members of an organisation that maintains “hot” lists or on data protection grounds. Without those lists then it is only by experience that Terminating CPs can make this judgement and by then the harm will have already occurred. Even where this suspicion is present, real time checks on individual CLI would cause delays and some genuine calls to fail.</p> <p>The comment in 4.18 that blocking calls would result in their not being immediately connected is incorrect, the calls would fail, they would never be connected</p> <p>4.32 suggests that the Terminating CP will be responsible for ensuring that only valid CLI is presented to the recipients of the calls. This could cause serious damage to industry. Terminating CPs can only present what is passed to them and should not be liable for errors, omissions or malicious actions by upstream CPs.</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>We have no additions to the list.</p>
<p>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?</p>	<p>Confidential? – N</p> <p>This is a good suggestion but we would want the original CLI to be available to assist with detecting and dealing with fraud and nuisance calls. We would also like the 08979 numbers to identify the origins of the calls as well as the CPs allocated the numbers. This could be done by having a two part CLI, the first part identifying the CP and the second part identifying the origin.</p>