



Non-confidential

Vodafone Response to Ofcom's Consultation: Guidelines for CLI Facilities



Introduction

Vodafone welcomes the opportunity to comment on Ofcom's proposals for amending the Calling Line Identification (CLI) Guidelines.

Accurate and reliable CLI is essential to consumer trust of telecommunications services. Regrettably, the integrity of CLI has been compromised over the last few years, and in turn this has harmed consumer trust in the CLI they see displayed, and more widely in telecommunications services: many people simply do not answer the phone unless it is a CLI they recognise. This leads to scope for further harm, because the ability to manipulate CLIs can mean that fraudsters use it as a tool in social engineering, mimicking a trusted-party's CLI in order to fool consumers into believing that they're a legitimate caller.

Vodafone therefore welcomes Ofcom's efforts to reintroduce integrity into the handling of CLIs, but caution that this will be a long process.

The proposed CLI Guidelines

Approach

It is disappointing that the proposed draft has not taken a more fundamental look at the structure of the Guidelines.

Firstly, terming the document "Guidelines" is unfortunate because it gives the impression that the requirements are somehow optional, rather than being an explanation of what Ofcom expects regulated providers to do in order to comply with the General Conditions.

Secondly, the structure of the Guidelines has not kept pace with the fundamental sea change to the treatment of CLI that has arisen as a result of the advent of IP technology. Historically, the position has been that in the vast majority of cases, the CLI displayed has been under the direct control of the originating network. It was either statically configured in the network (Network Number CLIs used for residential and mobile customers, Type 1 Presentation Number CLIs used for enterprises) or was verified by the network (Type 2 Presentation Number CLIs). Whilst it was possible for the calling customer to dictate the CLI which will be displayed on their calls (Types 3-5 Presentation Number CLIs), these have been very much the exception rather than the norm.

The introduction of SIP has changed this: inherently every call entering the network from a SIP-enabled customer has a field ("From:") which is used to convey a Presentation Number, and international standards are written from the perspective that it would be an exception for the originating public network to overwrite that. Whilst operators can seek to make public network population of the From: field the default, customer pressure will seek alignment with international standards. Further, the structure of enterprise networks is evolving so that rather than having access to the public network at each individual site, it is far more common for there to be only one or two connections, with calls carried over the enterprise's private



data network to reach these access points. This will mean that for enterprises it is likely that the balance will shift so that Type 3-5 Presentation Numbers become the norm, with network-configured CLIs reducing in volume. As this response will subsequently discuss, while Types 3-5 Presentation Numbers have valid use cases, they are also at the root of illegitimate CLI spoofing which facilitates nuisance marketing calls – their usage must thus be under the lens of Ofcom’s regulatory microscope.

Against this backdrop, it is unfortunate that the draft Guidelines retain the existing document structure with Presentation Numbering being an afterthought which is relegated to an Annex. Presentation Numbers are largely what consumers see on their display and the rules associated with them should be centre-most in the regulations. As we highlight in our detailed comments to the drafting, the current approach has led to some material being unclear of whether references to CLI are intended to be the Network Number – used to identify the point of ingress into the public network, or Presentation Number – used for display purposes for return calls. At the very least, wording needs to be tidied up, but Vodafone’s position is that the whole document should be restructured.

Network Number and Presentation Number CLIs

The terms Network Number and Presentation Number CLIs were originally born of legacy C7 signaling rather than regulatory terminology. NICC Standards ND1016¹ defines these as:

Network Number: *The digits that comprise a unique E.164 [2] number that unambiguously identifies the point of ingress of the call to a Public Electronic Communications Network.*

Presentation Number: *A number nominated or provided by a subscriber to be used for Display Services and can be used to make a return or subsequent call.*

The Guidelines continue this approach, with a Network Number being always present and the Presentation Number being an optional element that *maybe* provided on request of the caller. This causes confusion as to the regulatory requirements. For example Ofcom has views about the nature of the number in the CLI that’s displayed to the end user (e.g. it should be possible to make a return call, the cost of that call), but whether those requirements then apply to the Presentation Number or Network Number depends on the particular call scenario – what is displayed under the existing terminology will be the Presentation Number if it’s there, otherwise the Network Number.

Vodafone believes that this regulatory model should change: the regulations should term the Presentation Number as that which is used for display services, and the Network Number as a network-internal construct which identifies where the call entered the public network. This would mean that every call would carry both CLIs (even if they were the same value), with the mechanism for doing this varying according to the specific signaling system. By taking this approach, it would allow Ofcom to clearly specify in the Guidelines the characteristics which are expected of each type of CLI.

¹ <http://www.niccstandards.org.uk/files/current/ND1016v3%202%201.pdf?type=pdf>



In SIP there are always two parameters carried, the "From" header field carrying the number to be displayed (in this context Presentation Number) and "P-Asserted-ID" carrying the Network Number. As stated, in many cases – for example residential fixed telephony, and indeed mobile - the Network Number and Presentation Number CLIs would be of the same value. Legacy signaling systems such as C7 could continue to exploit this by not carrying a duplicate parameter where this is the case. However, the key point is that Ofcom could lay down what it requires of Network Numbers (e.g. that they unambiguously identify where the call came from) separately to what it requires of Presentation Numbers (e.g. the maximum call charge, that they should actually route somewhere), without the two becoming confused as is currently the case.

Acceptable Presentation Number CLIs

Vodafone believes that Ofcom has erred in its proposal at A1.5 that the nature of a Presentation Number are that

It must not be a number that results [in] charges in excess of the cost of calling a standard geographic number or a mobile number. (NB the exploitation of a Presentation Number to generate revenue-sharing calls may constitute persistent misuse of an Electronic Communications Network or Electronic Communications Service).

This differs from the existing Guidelines, which state:

It must not be a number that connects to a Premium Rate Service prefixed 09, or to a revenue sharing number that generates an excessive or unexpected call charge (NB the exploitation of a Presentation Number to generate revenue sharing calls may constitute persistent misuse of an Electronic Communications Network or Electronic Communications Service).

Either by intent or ill-thought editing, the consequence of this change is that enterprises will no longer be able to use NGCS (including 08) numbers as CLIs, other than freephone numbers. This is because 08 numbers cannot meet the above criteria: geographic calls are typically included in bundles whereas 08 calls are not. Even where geographic calls aren't included in bundles, they will almost always be cheaper than the NGCS Access Charge. We'd further highlight that the effect of the wording is to demand that an originator uses a CLI which depends on the commercial pricing that each terminating network imposes for their outbound calls, rather than being something which is under the control of that originator.

Banning 08 CLIs would have profound implications because many enterprises make use of such numbers. The practical impact is that large volumes of customers would need to have a number change, and in order to avoid confusion to their customers would probably wish to change their marketing materials to align with whatever number they migrate to. A one-year notice period would not be enough. If this is indeed Ofcom's intent, then the way to propose it is in a manner that the stakeholder community impacted would have visibility. Burying the change in a document predominately aimed at network providers, and not flagging this fundamental change at that, is not good regulatory governance.

We sincerely hope that Ofcom hadn't intended to ban usage of 08 CLIs, and that the implication of the wording simply hadn't been recognised. Vodafone does empathise with Ofcom's desire to prevent bill-shock, and indeed we do recognise that 08 CLIs can present issues: we have been the victims of Wangiri fraud based on the usage of 08 CLIs, and our nuisance call blocking initiative places particular scrutiny on calls with 08



numbers. However, the existing wording is sufficient to prevent excessive call charges, and there is no need to amend the wording in the way proposed. In the event that Ofcom does intend to ban the usage of 08 numbers, it is incumbent on it to produce a regulatory impact analysis which demonstrates that any reduction in consumer harm is greater than the cost to many enterprise customers of having to go through a number change.

Reliability of CLIs (in particular Types 3, 4 and 5 Presentation Numbers)

Vodafone accepts that both originating and terminating networks have a role to play in ensuring the reliability and integrity of CLIs.

Originating networks should ensure that CLIs that they allow into the public network are valid. In the case of Network Numbers, this can be a categorical requirement immediately, because inherently these are populated by originating networks – there can be little excuse for contravening the Guidelines.

In the case of Presentation Numbers, however, fulfilment of this obligation will necessarily evolve over time. Types 3-5 Presentation Numbers – where enterprises are able to dictate the number that is displayed on their calls – have a valuable role to play. As described above, enterprise customers are typically evolving to a model of small numbers of access points into the public network with calls carried over their data networks to them: absent Type 3 Presentation Numbers, it would be impossible to display a meaningful CLI. Similarly there is a thriving call-centre industry that does play fair by the regulations, and it is common for call-centres to generate calls on behalf of many clients: absent Type 5 Presentation Numbers, they couldn't present a meaningful number to allow a return call. Ofcom should therefore resist any knee-jerk demands to ban or restrict Type 3-5 Presentation Numbers.

Presentation Numbers do, however, present a conundrum in determining how to ensure that CLIs are reliable. As set out below, STIR technology may have a role to play, but will not be implemented in the UK for a long time. In the short term, then, focus must be on getting the right contractual safeguards to ensure that enterprise customers with Types 3-5 Presentation Number CLIs understand the rules around numbers that they are permitted to use, and their obligations in populating these numbers. In this context, whilst Vodafone has historically used contractual side-letters to explain this to customers using such CLIs, we are in the process of changing our core enterprise customer terms and conditions, in recognition that with SIP, usage Types 3-5 very much becomes the norm.

Terminating networks have a role to play in ensuring that calls have valid CLIs. For example, Vodafone's mobile network rejects calls with CLIs that Ofcom has notified us as not being assignable to end-users (i.e. protected ranges). However, we must clarify that this is good practice and aimed at protecting our customers: it should not be the terminating network's obligation to ensure the accuracy and reliability of CLIs, as fundamentally that responsibility must lie with the originating network that allows such calls into the network.

Where our views diverge from Ofcom's proposals is in the treatment of transit networks. Inherently transit networks are largely dumb pipes, with all technical specifications pointing to them not interfering with the



signaling. This role is also reflected in the minimal margins that networks can commercially charge for this highly competitive service. Against that backdrop, Ofcom is wrong to seek to put any obligation on transit networks to check the integrity of signaling fields: to do so is adding cost and complexity and ultimately protecting terminating networks' customers against non-compliance with regulations on the part of the originating network. It is not for transit networks to "check originating networks' homework", and Ofcom is wrong to suggest that transit networks should be compelled to do so.

Inbound international gateways have a role to play, and we welcome Ofcom's endorsement of ND1016 that where a CLI is absent or perceived to be unreliable, the gateway should insert a Network Number that at least identifies where the call entered the UK network. Vodafone also supports the proposal to designate the number range 08979 for this purpose. We do, however, have some concerns about the ability for this to be implemented by October 2018, particularly on legacy equipment. Vodafone will make all reasonable endeavours to comply, but ultimately there needs to be a review point in summer 2018, with a decision then taken as to whether to enforce (note that this does not prevent the regulation coming into force at this point, rather it may be pragmatic for Ofcom to formally agree to forebear on penalising non-compliance until an agreed date).

Unavailable CLIs

CLIs classified as "Unavailable" have always been a source of confusion, with many people within the industry interpreting this as meaning the CLI isn't available, whereas the original intent was that it indicated that the ability of the caller to withhold their CLI wasn't available.

The classification of Unavailable (which is better termed "Restricted by Network") is still appropriate in some cases, notably on inbound international call cases, especially where the inbound network has injected a CLI from the 08979 range. However, with certain exceptions² it is difficult to see why the classification Unavailable would be used on calls from a regulatory-compliant UK originating network. We would therefore suggest that this is removed as an acceptable CLI classification for UK originations, or at the very least its usage should be constrained to legacy situations in para 4.14 of the Guidelines.

Privacy of CLIs – outbound international

Paragraph 4.16 continues the requirement that calls to international networks only have CLIs conveyed where *"they [the international network] have good reason to believe that the CPs in the onward chain will respect the privacy markings"*

Vodafone supports this removal of withheld CLIs on calls to international destinations beyond the EEA (with the exception of certain agreed destinations). However, it would be of great benefit if Ofcom and ICO could liaise to draw up a list of "trusted" and "non-trusted" destinations. As things stand today, each regulated provider will have their own take on the situation, meaning that with extensive least cost routing by

² Historically certain Government departments have marked CLIs as Unavailable, but it is unclear if this continues to be the case.



originating networks it will vary on a call-by-call basis whether calls to a given destination have withheld CLIs removed or left intact. Further, we are under constant pressure to pass through withheld CLIs to locations far beyond the EEA and what could reasonably be considered a “trust domain”, on the basis that contractual agreements with the next carrier provide a sufficient safeguard.

Answers to questions

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?

Please see our comments above.

In the short term, authentication can realistically only be at a contractual level at the originating network, and via tactical solutions at the terminating network. It is impracticable to update every network type to be able to block invalid CLIs today: for example, Vodafone has configured its mobile network to block CLIs from protected ranges, but this is not technically feasible on our legacy fixed circuit switched networks and such measures will need to await technology refresh.

In the medium term, it may be possible to configure networks to only route calls with CLIs that are issued by Ofcom to networks, in particular if central routing engines are deployed.

In the long term, STIR holds out the prospect of originating networks digitally signing CLIs, so that terminating networks can establish a level of trust according to who admitted that call into the network. However, as NICC Standards forthcoming report on the topic will highlight, there are certain key use cases that would not be captured, and the implementation costs will be significant. Realistically, the capability would require a central numbering database, and end-to-end SIP on a universal basis: this would imply implementation couldn't usefully occur before the mid-2020s, based upon BT's stated timeline for network upgrades. If STIR technology is to be implemented, it would need to be universal to accrue any benefit, which implies a regulatory requirement. For that to happen, Ofcom will need to construct a robust cost-benefit analysis.

We note that many techniques are “subject to technical feasibility” with the word “economic” removed. There is a need for clarity in this area: almost anything is technically feasible, the question is usually whether it is feasible at a proportionate cost. To take an extreme example, STIR could be implemented next year if every regulated provider dedicated the entirety of industry technical resource to this topic, and ripped out every legacy network to replace it with a STIR-capable IP one. Every other service innovation and regulatory initiative in the industry would need to be paused, but STIR would be implemented – a perverse outcome. A requirement that states that networks must ensure that CLIs are valid, subject to technical but not economic feasibility (as Ofcom has stated) implies that we must go down this path regardless that it would put every network operator out of business and ensure that Ofcom fails in its other regulatory goals. Vodafone understands that Ofcom wishes to remove wording that would allow network operators to opt out of



regulation based upon cost, but it cannot possibly have been Ofcom's intent that everything should be implemented regardless of cost.

In assessing technical feasibility in the journey towards a more reliable CLI, there is a need to agree between Ofcom and networks which steps are proportionate. We need to distinguish between those expected to be implemented immediately with existing network nodes, those which will have a target future date to be implemented on existing network nodes, and those which will be required to be implemented as technology is refreshed (potentially with a backstop date). Such an agreement would result in a timeline with the CLI Guidelines evolving to reflect the state of the art of the possible. Unfortunately, because the Guidelines have been published in a draft form rather than being developed collaboratively, this isn't currently the case.

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

Please see our general comments above, and specific comments to the draft Guidelines below.

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

Annex 1 contains the correct types of Presentation Numbers. However, per our observations above Vodafone disagrees that Presentation Numbering should be relegated to an Annex.

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?

Vodafone agrees with the designation of 08979.

The standards devised by NICC will ensure that in the vast majority of cases this CLI will be a network-internal matter and not visible to end-users, however there are certain edge scenarios where it has been identified that the 08979 CLI could "leak" to be displayed. For this reason, ND1016 sets out that it is good practice to route return calls for these numbers to a recorded announcement (Vodafone suggests this would be an announcement provided at the originating network as it shouldn't vary according to which gateway inserted the 08979 CLI, indeed it would be undesirable for it to do so).

Simply designating the number range in the National Telephone Numbering Plan does not mean that originating networks will adopt it and route the range (or more precisely in this context, that terminating networks will route any return calls attempted to the 08979 range). In contrast, if the range was designated as a Non-Geographic Number, then under the revised General Condition B4.2(a) providers would be



compelled to route appropriately. Unfortunately, it does not fall into this definition as under the National Telephone Number Plan, “Non-Geographic Numbers” are defined as:

any Public Communications Network Number other than a Geographic Number

and “Public Communications Network Number” is in turn defined as

*a Telephone Number that is available for Allocation, Adopted or otherwise used on a Public Communications Network and **is not a Network Code**, an Administrative Code, a Telex Service Number or an X.25 Data Network Number;*

(our emphasis).

Unfortunately, 08979 has been incorporated into the National Telephone Numbering Plan by adding it to the list of Network Codes, hence it is not a Non-Geographic Number, hence terminating networks are not under any obligation to route return calls.

We consider that this issue could be addressed in the following ways:

- by amending the CLI Guidelines to make it clear that Ofcom expects networks to route the numbers, or alternatively
- by changing the definition of Public Communications Network Number so that the emboldened text above reads “is not unless excluded in Table A.3, a Network Code” and putting this exclusion against 08979, or alternatively
- by incorporating 08979 into Table A.1 rather than Table A.3 of the National Telephone Numbering Plan.

On the whole, the last of these options is probably the simplest.



Detailed comments to draft Guidelines

Para	Nature ³	Comment	Proposed change
2.5	E	The wording of "not prevent the presentation of the calling line on a called line" is untidy	Change to "not prevent the presentation of the CLI to the called party"
2.7	E	As these will become the Guidelines in force, the tense is incorrect	"The current guidelines apply to CPs..." and "Therefore this applies..."
2.9	S	Our interconnect agreements point to "relevant regulation" and in many cases refer to the CLI Guidelines. However this is not universally the case and it would be disproportionate to re-open agreements that are many years old in order to insert text saying that the other party will comply with regulation when they're compelled to do so in any case: an interconnect agreement is not the place to enforce regulation. At the extreme, if CP "X" breaches the Guidelines and their interconnect agreement with CP "Y" does not specifically mention the Guidelines, then with this text Ofcom could imply that CP "Y" is also in regulatory breach – clearly unreasonable and not the intent.	Change the wording to encourage CPs to reference these Guidelines rather than mandate.
2.11	E	Reference to "the NICC" and footnote is incorrect	Change "the NICC" to "NICC Standards" and change footnote to "NICC Standards is the..."
2.12	S	The text implies that the document is relegated to being somehow optional, by saying that the guidelines are not binding.	Suggest wording such as "These guidelines set out the matters that we would take into account when considering compliance against legally binding requirements such as:"
4.3	S	This text has conflated GC C6.4a (must ensure that call has a valid CLI) and GC 6.4b (must ensure caller privacy). While 6.4a is subject to technical feasibility, 6.4b is absolutely not and is mandatory.	Separate out these requirements into separate paragraphs

³ E = editorial, S = substantive



Para	Nature ³	Comment	Proposed change
4.3	S	This text – and unfortunately GC6 itself – conflates the requirements of Presentation Numbers and Network Numbers. The number displayed must be a dialable telephone number; the Network Number (if not displayed) may well not be and certainly won't result in a meaningful return call.	Requirements need separating out into those of the CLI only used internally, and the one used for display purposes. Under our proposals above, these could be separated into Network Number and Presentation Number. In the event that Ofcom doesn't accept this, then language such as "if the CLI is to be displayed to the end user than it must be a dialable number" will need to be used.
4.6	E	Apostrophe in wrong place on "customer's"	Change to "customers' "
4.9	S	The text once again confuses the requirements of CPs with respect to Network vs Presentation Numbers. For a Network Number, the CLI must either be from a range allocated to them or be imported to their network (otherwise the requirements of a Network Number unambiguously identifying the entry point to the network cannot be met). In contrast, the text of 4.9 referring to CLIs being from a range allocated to the CP or the customer having permission is one that refers to Presentation Numbers	Make clear which requirements are of Network and Presentation Number CLIs
4.9	S	The second part refers to international gateway operators and trust of CLI. As Ofcom has now made the range 08979 available, it should be clear that this range should be used. The requirement to route calls to an explanatory announcement is a universal one rather than being uniquely on the gateway operator.	Separate out these considerations into a separate paragraph vs those of national originating networks. Explicitly reference 08979. Clarify that the requirement to route calls to an explanatory announcement falls on all regulated providers.
4.10	S	Vodafone disagrees with the requirement placed on transit networks. It is not the role of transit networks to police whether originating networks have fulfilled their regulatory obligations under GC C6.	Amend to clarify that the role of transit operators is to pass CLI information without manipulation.



Para	Nature ³	Comment	Proposed change
4.10	S	Text for terminating CPs is confusing many things. For example the wording " <i>The Presentation Number is not always required, but the call should always be associated with a Network Number, as a minimum.</i> " is a requirement of the originating rather than terminating network. Per our observations above, we consider it would be best to change the definitions of Presentation Number and Network Number, which would lead to this paragraph being rephrased.	<p>Separate out this para so transit and terminating network requirements are in distinct paragraphs.</p> <p>If Vodafone's change to Presentation Number vs Network Number is accepted, then:</p> <ul style="list-style-type: none"> • Insert a sentence that the Presentation Number should be used in all cases • Move the requirement that all calls should carry a Network and Presentation Number to the text on originating CPs <p>If Vodafone's change to terminology isn't accepted, then:</p> <ul style="list-style-type: none"> • Replace the sentence "The CLI presented.." with "The CLI presented should be a Presentation Number where one is provided, otherwise the Network Number." • Move the requirement that all calls should carry a Network and optionally a Presentation Number to the text on originating CPs
4.11	S	This section conflates requirements of Presentation and Network Numbers.	Separate the requirements into those of numbers to be displayed (valid, dialable, uniquely identifies caller, call cost) and those of CLIs only intended to be used internally (valid, uniquely identify ingress to public network).
4.11	S	<p>The first bullet refers to it being mandatory that CLIs are allocated for use in the UK in the National Telephone Numbering Plan.</p> <p>This is unachievable for terminating networks because it would imply they can never display an international CLI on a call from overseas.</p> <p>This is unachievable for originating networks because there are valid use cases (global call centres hosted in the UK, mobile roaming) which will use international CLIs for display purposes</p>	Amend so that sentence reads "Where a UK number is used, it must be one allocated for use in the National Telephone Numbering Plan"
4.11	E	(re-iteration) For Network Numbers that are accompanied by Presentation Numbers hence aren't to be displayed, the "dialable number" requirement doesn't apply	As above



Para	Nature ³	Comment	Proposed change
4.11	S	The final bullet bans the usage of 08 (excl) 080 numbers. See above commentary	Revert to previous wording
4.12, 4.13	S	Disagree with requirement on transit networks to validate CLIs	Delete
4.12, 4.13	S	The inclusion of the wording "non-dialable" without narrowing this to the CLI to be displayed means that many Type 3 Presentation Number calls would be blocked as the underlying Network Number is typically non-dialable	Remove these words
4.14	S	Clarification is required as to what scenario will result in a UK customer being unable to withhold their number, i.e. as to why the status "Unavailable" is a valid one for UK originations	Either delete this status, or clarify that it is a legacy case and should not be used for any new provisions
4.15	S	The CP at the first point of ingress is not uniquely responsible for ensuring that the <u>caller's privacy requirements</u> are met, this falls on all CPs in the all path.	Change first sentence to read "...the CP at the first point of ingress to the UK networks is responsible for ensuring that the call signaling reflects UK regulation to ensure that the caller's privacy rights are respected."
4.15	E	Unavailable (restricted by network) is used for the scenarios described but also in interworking cases where there is no meaningful CLI.	Add the words "or absent" to the end of the final bullet
4.15	E	Unavailable bullet – superfluous "the"	Should read "...where there is explicit indication that the originating network has restricted..."
4.16	S	Per the text above, it would be useful for Ofcom/ICO to collaborate to draw up a trusted/untrusted list.	List would be referenced from this para
4.19	E	The term "account management purposes" is taken to mean "billing/accounting", but the terminology used could suggest that account teams – i.e. those who manage customer relationships – would be allowed privileged access when this is not the intent.	Reword
4.21	E	We do not disagree with this requirement, but would note that it is increasingly difficult to distinguish who is and isn't a CP	Better definition/guidance of this would be appreciated.
Annex A	S	General – this material should not be in an Annex	Incorporate into main body of Guidelines



Para	Nature ³	Comment	Proposed change
A1.2, A1.3	E	Why is an Annex about Presentation Numbers giving rules on the characteristics of Network Numbers?	Incorporate into main body of Guidelines
A1.2	S	Once again disagree with the implication that 08 numbers should not be used for display purposes. In any case, the final bullet should clarify that this is only the case where the Network Number is used for display purposes	Amend per the main body of the text.
A1.4	E	The Presentation Number identifies the caller AND allows a return call to be made (current text says "or")	Reword to "...that can identify that caller and be used to make a return call..."
A1.5	S	Final bullet, disagree with prohibition on 08 numbers	Amend per the main body of the text.
A1.7	E	"Local exchange" is a legacy term	Change to "originating node in the public network"
A1.11	S	Recognising this is text carried over from the current guidelines, clarification is required of the sentence "Unlike other types of Presentation Numbers, Type 4 numbers may not always be dialable" – we are unaware of any call case where that is correct.	Subject to clarification by NICC, delete final sentence.

Vodafone UK
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