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Response to Ofcom's First consultation:
"Promoting Trust in Telephone Numbers"

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Magrathea welcome the opportunity to respond to this consultation, which we understand to be the initial stages of a more detailed consultation process. We have been campaigning directly, as well as representatives of ITSPA, to improve the number portability process in particular and therefore we are delighted to have the opportunity to support Ofcom's progress in this area.

Response to consultation questions

Question 3.1: Do you have further views about the implementation of STIR?

We feel it important to highlight that many of the complaints we receive relating to nuisance calls are in fact unwanted calls made legitimately, with valid CLI information, and the introduction of STIR is not going to prevent those and therefore we are not confident that this solution will resolve all the concerns have in regard to consumer harm.

However, we agree with the aims and believe introducing STIR will improve the situation to some extent, not least as it will require proper compliance to the CLI guidelines by all networks which in itself will bring about improvements.

Question 3.2: Are there any other approaches we should consider for addressing CLI authentication?

Greater monitoring of adherence to CLI guidelines would also go a long way to improving CLI handling, as would general improvements in the information stored about numbers and their Service Providers enabling responsible networks to carry out due diligence.

Question 3.3: Do you agree a common database would be required to support the implementation of STIR?

It is our understanding that a common database is not required to support STIR, however it is considered to be the simplest method and will have the side effects of being useful for other purposes (i.e. number management and porting) this making it better value for money for stakeholders.

Question 3.4: What are your views on using blockchain technology as the basis for a common numbering database to support CLI authentication? What other solutions do you think should be considered and why?

We are involved with the blockchain trials and feel it is too early to assess its suitability. We do have some reservations if blockchain will be the correct solution and once the trial is completed it needs to be assessed against the cost and viability of a centralised database.

Whichever solution is used we feel it important that Ofcom remain an authoritative source of numbering data and that the solution does not add unnecessary complexity or vulnerability to the processing and managing of data.

Question 3.5: What are your views on timeframes?

The 2022 timeframe set out in the consultation would appear to be achievable if all parties are motivated and aligned to progress the projects needed to bring about the solution. There are two main blocks that we would anticipate:

> The first is cleansing the data. To populate a common database with correct data will be a significant task and will take considerable time.   This process was recently carried out in Ireland which far fewer range holders involved and it still took many months to complete. Given the benefits of correct data, regardless of the outcome of the current round of consultations, we would urge Ofcom to consider requiring this data cleansing work to commence as soon as possible.

> The second is IP migration. An assumption has been made in this consultation document that telecom providers' will be implementing an IP network ahead of 2022 and that STIR can only work if the majority of calls are carried on such a network. However, at this point in time BT in particular have made no announcements about their core network migrating to IP or the shutdown of their TDM interconnect infrastructure. On that basis some telecom providers are still expanding their TDM connectivity and therefore to see a widespread IP environment by 2022 is probably now unfeasible, indeed if no steps are taking to encourage migration to IP soon the goal of 2025 is also questionable.

Question 4.1: What are your views on the current implementation of number portability in the fixed and mobile sectors?

Number portability, particularly for the business sector, causes a disproportionate number of faults, complaints and administrative burden for our team. Although the defined industry process is now outdated and overly 'manual' by nature it is generally agreed that it does deliver the necessary results if followed.

However, there is currently no regulatory requirement for industry to follow the defined process and that, combined with poor data management, means that a large percentage (approximately 40%) of porting orders fail first time. The impact of this is hard to quantify as porting issues tend to be measured beyond financial impact, including:

- Damage to the reputation of telecoms providers when a port cannot be completed or causes disruption in service through no fault of their own;

- Results in the consumer cancelling their migration to a new provider as they don't want the risk or difficulty, thus resulting in lost business for the telecoms provider going forward;

- Time and stress for all parties involved, with escalated issues often involving a number of members of the team for all parties before any resolution is reached.

In short, Magrathea have been campaigning for Ofcom to get involved in this problem area for some time and bring about change by way of strengthening the regulatory requirements to comply to standards and to move towards a better system that will enable faster porting and direct routing of calls going forward.

Question 4.2: What are your views on sharing the functionality of a common numbering database for CLI authentication to also support improvements in UK porting processes?

This seems like a sensible use of resource as it will serve at least two purposes thus making the case for cost and effort more palatable. Magrathea see porting as one of the key issues impacting consumers and therefore our only concern is that should CLI authentication be delayed for any reason that should not deter us from pushing ahead to resolve the porting situation.

Question 4.3: We are currently supporting a blockchain pilot. Do you have any views on using this technology for port transactions and a routing database? Are there other alternatives that should be considered?

Please refer to our answer to 3.4. Magrathea are actively involved in the proof of concept trials via the NICC working group and the NP Executive Steering Group and whilst we have some reservations that it will be the right solution, we do believe it worth testing to discover

if this could be a viable solution which would address some of the objections previously received when considering a centralised database solution.

The alternative of a central database should not be discounted as this more established method of managing numbering and portability may prove to be the most simple and effective in the end.

Question 4.4: What are your views on implementation timeframes and the importance of a common database solution being available to support the migration of telephony services to IP?

As per our response to Q3.5, we believe the timeframes set out are achievable and desirable, however they will require all parties to be motivated to act within those timeframes.

Whilst a common numbering database would be the simplest method of achieving portability improvements, we don't think this is the only solution. We have previous stated that the process as documented today does actually work if it's followed and therefore an

interim or 'reserve' solution of mandating compliance could achieve at least some of the results we are working towards.

Question 5.1: What are your views on the potential for a common database solution to also provide shared functionality to support number management?

We believe this is a sensible solution. Ofcom's current NMS does not allow for more granular data to be stored and the ability to record hosting networks or sub-allocatees would be helpful for many reasons as well as facilitating porting and CLI authentication.

Question 5.2: What do you see as the benefits or disbenefits of changes to number management post PSTN retirement?

The benefits will be great ease of identifying all parties in the supply chain and better efficiency when managing numbering resource.

Question 6.1: Do you agree, in principle, with the need to develop and adopt a common numbering database? If not, why not?

Yes we do agree in principle that this is the best way forward.

Question 6.2: If you do not agree with the need to develop and adopt a common numbering database, do you have any suggestions on how the issues we have set out in this consultation could be addressed?

Question 6.3: Do you agree that in the first instance industry should lead the implementation of a common numbering database, with Ofcom providing support to convene and coordinate key activities? If not, what are your views on how implementation should be taken forward?

Unfortunately, we do not wholly agree, there have been problems in the past caused by leaving industry to resolve similar challenges. Whilst Ofcom may not need to lead the development, Ofcom should mandate the development, use of the resulting solution and the timescales as this is the only way to ensure compliance.

Summary

- We support a common numbering database which will serve to improve number management, portability and caller verification.
- We believe the timeframe as set out by Ofcom is achievable but will require 'driving' by Ofcom rather than industry alone.
- Data cleansing will form a major part of the project to populate the database and should begin as a matter of priority to have any hope of achieving the 2022 target.