

Three
Star House
20 Grenfell Road
Maidenhead
SL6 1EH
United Kingdom

T +44(0)1628 765000
F +44(0)1628 765001
Three.co.uk



Three.co.uk

Ofcom
Riverside House
2a Southwark Bridge Road
London
SE1 9HA

By email only
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Summary of Three's response to Ofcom's First consultation on Promoting Trust in Telephone Numbers

1. Please see below for Three's response to Ofcom's First consultation on Promoting Trust in Telephone Numbers, published on 11 April 2019.
2. This is a non-confidential version of Three's response. Confidential information has been replaced with the symbol [X].
3. Our response is focused on those specific consultation questions which are most relevant to Three UK. At this initial stage (before seeing Ofcom's detailed proposals), our responses to the questions are framed at a high level, outlining our general views on each of the issues raised. We look forward to engaging with Ofcom on its detailed proposals on promoting trust in telephone numbers, to which we can reply in more detail.

Response to Ofcom's detailed questions

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

4. We believe that implementing STIR is a useful first step towards helping industry to tackle nuisance calls and for communications providers to comply with the obligations of GC C6.
5. Combatting invalid or non-diallable CLI continues to be a priority for Three. [X] We believe that implementing STIR would help achieve this objective.
6. However, we note that STIR will not address all the obstacles to tackling nuisance calls, such as presentation number spoofing, and international calls.



7. The complexity and cost of implementing STIR across all networks in the UK must also be considered, and we look forward to Ofcom's assessment of this in the next consultation.

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

8. In the shorter term, in addition to the STIR proposal, Ofcom might also consider process-oriented solutions to address the problems of identifying originators of nuisance and scam calls. For example, a process to enable the tracing of calls across multiple networks using call data records (CDRs) would allow operators to take effective and timely action against nuisance/scam calls.

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

9. We agree that a common database in the way Ofcom has proposed would support the implementation of STIR.

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?

10. Ofcom should consider all commercially available options to allow the common numbering database to support CLI authentication and to set out an assessment of their functionality, resilience, security and cost.

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

11. [X] Three is supportive of these reforms and we believe it be a positive measure for consumers.
12. We will also look to see what further improvements could be made to the number porting process, to make it work even better for consumers.
13. Number portability is an important service for consumers and, therefore, the current porting processes should be considered as part of Ofcom's drive to promote trust in numbering. In particular, this should consider how these processes can be updated to match consumer expectations.



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?

14. We believe that the processes for porting numbers in the UK might certainly improve where there is a common numbering database, that can be accessed by all operators. In particular, it might be an effective vehicle for expediting the porting process.
15. That said, the benefits brought by having such a database need to be considered against any cost borne by industry for the establishment and management of the database.
16. Accordingly, we look forward to considering more detailed proposals by Ofcom in this respect, in a further consultation.

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?

17. As stated above, we believe that Ofcom should consider all commercially available options and set out an assessment of their functionality, resilience, security and cost.

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?

18. We would like to understand in more detail precisely how Ofcom envisages industry to take the lead in implementing a common numbering database. In particular, we would expect Ofcom to outline an assessment of the expected cost to industry of implementing a common numbering database, in a further consultation.