

Adrian Ball
Office of Communications
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6th June 2019

Dear Adrian

Reference: Promoting Trust in Telephone Numbers – 1st Consultation

Many of the specifics regarding this Consultation will invariably be addressed by other operators; Ziron was involved in the ITSPA response and we don't feel the need to repeat most of that, save to submit our broad support for the contents.

That said, there is one specific point we feel needs to be reiterated; that due process needs to be taken on the projects for CLI Authentication and Number Portability.

From various discussions in industry forums, we are aware there is a school of thought that basically says that Ofcom has a solution that is looking for a problem – be that blockchain or STIR.

As it stands, we are not convinced that the problems have been properly articulated and that the desired outcome for end users has been properly debated.

We have no doubt that other Communications Providers will be pointing out to Ofcom that the pain experienced in number portability each day is often one of process, ambiguous regulation or game playing by certain operators. Many of these issues do not require the development of radical new technology, they simply require the engagement of a regulator that is willing to use its statutory powers to make it clear what the outcome for end users it wants to procure is.

For example, we are aware of ports that have taken months to effect; indeed, in the same industry forums we mention above, we have heard of cases where years have elapsed. Ofcom have never intervened to define “shortest possible time” or “as soon as reasonably practicable” for the purposes of General Condition of Entitlement (“GC”) B3 (or GC 18 before that).

Ofcom's attitude to number portability has been one of expecting that the class will behave itself whilst the teacher is on an extended break. Clearly, in the last decade, the industry has been unable to resolve the problems itself and continuing to expect that the vested interests that have historically frustrated progress will magically resolve themselves is folly.

In terms of CLI Authentication, other than giving faith as to which CP in the chain is willing to "sign" to say they injected the CLI information in the signalling, we fail to see how it will significantly address nuisance calls. With respect to spoofing, there is promise, but there has to be trust in the process and we need to engage with the next level of detail to be able to decide whether STIR is a solution to that issue.

We urge Ofcom to take a step away from the specific technologies/solutions that are being debated and bring the dialogue back to basics. A detailed problem statement accompanied by an thorough articulation of "what good looks like" in the eyes of the regulator (with the clear resolve by the regulator to impose conditions to mandate their vision) would force the industry to actually address much of the pain that we experience each day.

Otherwise, we risk a pair of expensive white elephants and the same problems enduring for the next decade.

Yours sincerely,

Alexandre D Kinch
CEO