

Your response

Aloha welcomes the opportunity to provide feedback to Ofcom's package of consultations to strengthen the confidence of CLI and numbering in an attempt to reduce harm.

Question	Your response
Question 1: Do you have any comments on the suggested measures set out in Section 3?	<p>We think the checks referred to are reasonable and are likely to already be adopted by many providers as they are typically good practice.</p> <p>Every business relationship is different and we feel the guide in Section 3 accommodates this.</p>
Question 2: Have you used any other due diligence checks that you think would be beneficial if adopted across the industry?	<p>We feel that most of the examples of indicators of high-risk we would agree with, however another 3 which we feel that could be added are:</p> <ul style="list-style-type: none">- The user is NOT using an IP that would be consistent to that of a retail internet service provider in the UK (i.e. appears to be a VPN).- Email address is from a generic free email provider (i.e. not a business email).- Customer is being evasive and too broad on use.
Question 3: Do you have any comments on the suggested measures set out in Section 4?	<p>We agree with Section 4, although it would be helpful to introduce guidance in situations where numbers have been ported (i.e. require all parties in the call chain to work together).</p> <p>Furthermore, it would be helpful for the guidance to comment on a scenario where a number is suspected/confirmed of being misused and the provider takes the decision to withdraw the number, the customer then attempts to port the number out. Would Ofcom consider this a breach of the portability rules within the GC context should the provider (who has threatened to or has withdrawn the number(s)) refuse the port request or would Ofcom expect the provider to allow the number to be ported out.</p>

	<p>It would also be helpful if Ofcom could provide guidance where a number has been ported out from the range holder and the range holder is receiving complaints. Does the range holder have any rights to suspend or even withdraw a number where it has been ported out and the CP the number has been ported to is not (in the range holders opinion) acting fast enough (after following up on several occasions)?</p>
<p>Question 4: Have you used any other ongoing checks to ensure compliance that you think would be beneficial if adopted across the industry?</p>	<p>No, we feel the suggestions in section 4 are sufficient</p>
<p>Question 5: Do you have any comments on the suggested measures set out in Section 5?</p>	<p>We have a few suggestions that maybe worth additional thought and consideration:</p> <ol style="list-style-type: none"> 1) Unified contact web page or published contact list for raising abuse issues to the CP. When a number is being misused, typically time is of the essence. Anecdotal evidence would suggest that there can be an issue in getting in touch with the right team within the CP who handles complaints, therefore we would suggest (where some CPs have already done this) requiring a page that can be found via their main website which allows an investigator or organisation (for example who's organisation is the victim of impersonation) to get the contact details immediately (or better still raise a ticket) with the team who handle complaints within the CPs network to inform them of misuse. This should create a unified approach and make it easier for the authorities and those who are victims to bring to the attention to the CP that there may be an issue. Alternatively, Ofcom could compile a list of the generic abuse email contact details of range holders and publish this on their website.

2) **Setting SLA's targets for an initial review on a report of misuse.**

Expanding on point 1 that time can be of the essence in an attempt to thwart scammers agility in changing numbers/providers. An SLA target time for at least an initial review could be set on potential misuse raised by a CP or law enforcement of 2 working days. i.e issues raised by a CP/law enforcement are prioritised and at least begun to be looked at (although an investigation may take much longer). All other cases are at least initially reviewed within 5 working days.

3) **Provide clarification that Ofcom would expect us to work with law enforcement and not penalise a CP when knowingly keeping a number active which is being misused.**

It would be helpful if Ofcom can provide clarification that where law enforcement has requested the CP to keep a number active (even though it is being misused) in an attempt not to "tip off" an offender, Ofcom would not penalise the CP for this.

The above points in 1 and 2 we would like to see as part of the guidance and would not need to be set in stone, but targets industry should work towards in creating a unified approach in how to a) raise a complaint to a CP b) complaints are initially reviewed in a short space of time so clear cases of misuse are not prolonged unnecessarily.