

## Consultation response form

Please complete this form in full and return to [scamsconsultations@ofcom.org.uk](mailto:scamsconsultations@ofcom.org.uk).

<b>Consultation title</b>	Good practice guide to help prevent misuse of sub-allocated and assigned numbers
<b>Full name</b>	[REDACTED]
<b>Contact phone number</b>	[REDACTED]
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Three UK
<b>Email address</b>	[REDACTED]

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	The highlighted sections below are confidential
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	

## Your response

<b>Question</b>	<b>Your response</b>
<b>Question 1: Do you have any comments on the suggested measures set out in Section 3?</b>	<p><i>Is this response confidential? – No</i></p> <p>Three UK fully supports Ofcom' efforts to protect consumers from harm caused by the growing problem of scams facilitated by calls and texts.</p>

	<p>Indeed Three UK has processes in place to know its business customers and will have a contract with them to ensure numbers are used efficiently and effectively, and in compliance with regulations. Once numbers have been allocated to business customers, they manage the relationship with their own customers and must comply with the contractual requirements in Three's contract.</p>
<p><b>Question 2: Have you used any other due diligence checks that you think would be beneficial if adopted across the industry?</b></p>	<p><i>Is this response confidential? – Yes</i></p> <p>Three UK believes that for long number sub-allocations, requesting use-case approval forms when new ranges are assigned to a service provider is good practice to manage risk.</p> <p><b>[REDACTED]</b></p>
<p><b>Question 3: Do you have any comments on the suggested measures set out in Section 4?</b></p>	<p><i>Is this response confidential? No</i></p> <p>Three UK supports the proposal that there should be contractual obligations with business customers to manage compliance with regulatory requirements.</p> <p>There should also be processes in place to reassess the risk of number misuse after numbers have been sub-allocated or assigned, however, business customers are best placed to own these processes as the providers would not have visibility over the use of sub-allocated numbers by end customers. After allocating numbers, there are practical limitations on exercising control over how numbers are used and this is achieved mainly through contractual obligations which stipulate the controls and compliance with regulations. Therefore Three UK would suggest to Ofcom to recognise that the business customers are better placed to manage risk reassessment as they have visibility over the end use of numbers.</p> <p>If there are any reports of the numbers being misused, these should be addressed with the business partners and formal action should be taken if a business partner does not resolve the matter appropriately.</p>

<b>Question 4: Have you used any other ongoing checks to ensure compliance that you think would be beneficial if adopted across the industry?</b>	<i>Is this response confidential? – No</i>  N/A
<b>Question 5: Do you have any comments on the suggested measures set out in Section 5?</b>	<i>Is this response confidential? – No</i>  Three UK fully supports the need to respond proactively and promptly to any incidents and mitigate consumer harm.

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