



Vodafone Response to Ofcom Consultation:

“Good practice guide to help prevent
misuse of sub-allocated and assigned
numbers”



Introduction

Vodafone welcomes the opportunity to comment on Ofcom's proposed good practice guide to help prevent misuse of numbers. We view this as an extremely important topic; reducing the volume of nuisance and scam calls will require a combination of due diligence in providing service, careful monitoring of network traffic and customer reports to identify misuse, and effective take-down/blocking measures to stop perpetrators generating calls. Each piece of this jigsaw is critical – the solution cannot lie with any of these measures alone.

Answers to questions

1. Do you have any comments on the suggested measures set out in Section 3?
2. Have you used any other due diligence checks that you think would be beneficial if adopted across the industry?

In a perfect world, Communication Provider account management teams would sit with prospective clients over a cup of tea or coffee and explore in depth their intended usage of telephony service. Such an approach is not commercially viable, however, as traditional telephony providers face intense competition both from over-the-top applications that act as alternative to telephone contact, and cloud-based providers who support digital provisioning journeys for prospective customers. It is telling that when the Government needed to create the COVID track & trace outbound calling infrastructure, their suppliers turned not to traditional telephony providers, but instead to cloud providers resulting in calls entering the public network in a wholly unforeseen and unpredictable manner; if the State opted for a solution that could be provisioned in an automated way, it is indicative that private sector companies will similarly demand solutions which require least effort on their part.

The need for adequate due diligence therefore needs to be balanced against providing an easy provisioning path for legitimate customers, and the need to keep costs down to be competitive. It would be a hollow victory for Ofcom if Tier One Communication Providers adopted a gold-plated due diligence process, only for the bulk of customers to vote with their feet and use providers with lower quality due diligence; the practical outcome would be to distort competition and disperse customers into Tier Two and Three providers with whom Ofcom have less intimate compliance relationships.

Having reviewed Ofcom's proposals, we regard them as ideal due diligence checks, but adoption of these must be balanced against the need to provide the digital provisioning journey that is required by enterprise customers. Manual checks are rarely compatible with such a digital journey, and if we enforce these, we will



either drive customers to providers who don't demand such checks (for example because the competing service isn't telephony hence isn't subject to any such regulation), or drive them to lower cost services.

We have compared the proposals in the consultation against our current provisioning processes for the multitude of enterprise connectivity services that Vodafone provides, some of which have a traditional account managed arrangement, others have digital provisioning journeys. We do not claim to be totally aligned with Ofcom's proposals, but will work to be so where this is practicable, once the guidance has been confirmed. In the analysis below we set out where we consider the proposals set out are impracticable. For these aspects, we do not profess to have a monopoly on ideas, so if other respondents to this consultation have asserted that it is feasible to implement what Ofcom sets out, then we believe that Ofcom should facilitate information exchanges where Communication Providers could swap notes on the art-of-the-possible (we do not believe that this is an area where competition should be a consideration).

Note that we have redacted the remainder of this section in the public version not because it is in any way competitively sensitive, but instead because it could alert potential generators of nuisance calls to any gaps in our due diligence measures.

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3. Do you have any comments on the suggested measures set out in Section 4?

4. Have you used any other ongoing checks to ensure compliance that you think would be beneficial if adopted across the industry?

We agree with the principles set out in Section 4 and will embed into any new agreements and contract renewals. However, it must be understood that agreements are typically long term so it may be some time before the principles set out are fully incorporated into customer and reseller contracts.

5. Do you have any comments on the suggested measures set out in Section 5?

We believe that the measures set out are reasonable and will be reviewing our procedures in light of the guidance. We think it would be useful if Ofcom maintained a register of nominated contact points for dealing with reports of mis-use between Communication Providers.

Vodafone UK

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