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Your response

Question	Your response
Question 1: Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.	*Is this response confidential? – No* We agree. With appropriate validation, the CLI data that is invalid/non-dialable/doesn't uniquely identify the caller should be prevented. Calls to Emergency Organisations

	should be validated as well; however, don't automatically block the invalid numbers but rather put in a "watch list" for further investigation via analytics for potential blocking.
Question 2: Do you agree with our proposal to bring this modification into force six months after the publication of our statement (which is planned for Autumn 2022)? If not, please pro-vide reasons why a different date would be appropriate.	*Is this response confidential? – No* We agree. 6-months is an adequate timeframe from a technical perspective. We also believe with the proper solution this can be applied to the non-IP/TDM calls as well.
Question 3: Do you agree with the proposed changes to the CLI guidance? Please provide reasons for your response. Please set out your comments on each of the proposed changes separately.	*Is this response confidential? – No* We are involved in the STIR SHAKEN ecosystem in the US, as well as being very involved in other methods and technologies that provide call validation and blocking for both domestic and international traffic in other countries outside of North America. We believe there are great solutions with compatible technologies that provide the needed validation and oversight for both telcos and regulators. Overall we agree with the proposed changes to the CLI guidance. Involving transit/wholesale providers will be just as crucial in the long run with international calls. We believe with the correct validation solution and compatibility, each use case can be addressed and resolved for calls originating in the UK and from abroad. We also know this can be implemented for both SIP and non-IP/TDM networks as well. We agree with "calls that originate on a UK network". Having calls screened for 10 or 11 digit numbers would be a quick check to connect or release a call, and be implemented at zero or minimal costs. DNO numbers used in the CLI is another good quick check. In our line of work, the speed at which a decision must be made is imperative. The more validation checks you can get through in milliseconds the better. We agree with "calls originating on networks outside the UK". As more countries/regulators adopt versions of "call validation" this will ensure a validated decision is made in regards to blocking, and valid calls and CLIs are passed through to the terminating providers.

	We agree with “Blocking calls with invalid CLI that originate abroad”. International validation is currently possible, and through basic analytics, decisions to block calls can be made with beyond reasonable doubt. We agree with “Calls originating from abroad that use a UK CLI”. This does well to encourage all telcos to implement blocking mechanisms, and addresses legitimate use cases as well. One thing to consider are calls originating from Jersey due to having a “similar” CLI that most end-users at a glance may or may not understand the CLI being outside the UK. Validation and identification provided to the end-user would be a key component. We agree with the proposal on “Prohibition on the use of 09 non-geographic numbers”. Validation is key again. End-users should not be receiving calls with 09 CLIs, and also not have an accidental call back to a Premium Rate service. Something to consider in regards to the “Display Name Information” is the teclo’s use of UDP versus TCP. As Display Names get longer, the data packets sharing this information will be fragmented and disrupt the call process if UDP is being utilized, otherwise the packet size will need to be drastically reduced. This may require changes to how this information is shared and potentially result in slower call set up and potential costs. If packet sizes remain large, this will force providers to utilize TCP, which can lead to potential additional costs due to the needed transition. There are methods to help with this issue; however, for the most part the change will need to occur.
Question 4: Do you have any comments on the use of 084 and 087 non-geographic numbers as Presentation Numbers and/or on the impact if the use of 084 and 087 numbers as Presentation Numbers was prohibited in the CLI guidance? Are you aware of any examples of the use of 084 or 087 numbers as Presentation Numbers?	*Is this response confidential? – No* We agree that it is wise to address and get feedback from the telcos on the use of 084 and 087 non-geographic numbers. 100% agree with asking for feedback from stakeholders/telcos. This is going to be one of the better ways to fully understand what the impact will have on the telecom industry in the UK. We do not have examples of the use of 084 or 087 numbers as Presentation Numbers.