

## 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
<b>Question 1: Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.</b>	<p>We agree with it in principle, although we would welcome further detailed guidance on both the technical and administration responsibilities expected of such proposal in the 3 key stakeholder categories that make up a call (the originating CP, the transit CP(s) and the terminating CP).</p> <p>We can see that a significant amount of trust is being placed on the originating operator to correctly interpret and correctly implement the rules as the transit and terminating network would realistically have no technical or administrative means of determining whether a number (beyond conducting the 2 key technical checks of the typical 10-11 digit length and allocated by Ofcom. The DNO list would struggle to work in a transit/terminating scenario) is truly one which uniquely identifies the caller. In short, it relies purely on trust and some real-time call checking through the call chain to confirm if a number could be valid.</p> <p>Furthermore, we see how this proposal interacts with the Presentation Number Types (Pages 17 and 18 of the draft guidance of this consultation). Given the use cases that exist today and may in the future (e.g businesses of all sizes requesting to be 'multi-homed' in more complex ways), it may be worthwhile conducting a fresh look of the various presentation types to confirm and validate whether they are still appropriate and whether other types may exist now or in the future. We are not sure when they were written, but in the current format, we can find the current 5 Types being quoted in Ofcom documentation<sup>1</sup> almost 20 years ago (which may go further back and even predate Ofcom). Given the technological development and continually increasing use cases of telephony (especially in recent years)</p>

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<sup>1</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0028/12988/cliguide.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0028/12988/cliguide.pdf)

	<p>it's reasonable to think things may have changed slightly.</p> <p>Given the above, we note in section 3.9 (consultation documents) Ofcom states "...we consider that technically feasible steps can reasonably be taken by providers to check whether the CLI associated with a call is being used by the individual or organisation that has the authority to use the number...". We would welcome clarification on what Ofcom exactly means by 'technically feasible steps' and wonder whether you mean 'administrative feasible steps' meaning the steps referred to in the various Presentation Types (Pages 17 and 18 of the draft guidance of this consultation), where if this is the case, it would only apply to the originating provider who could take these steps.</p>
<p><b>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 provide reasons why a different date would be appropriate.</b></p>	<p>We would like to see Ofcom conduct a review into the 5 presentation types to validate if they are still appropriate, although failing that depending on how Ofcom foresees the implementation, we see 6 months as reasonable if Ofcom expects administration processes on the originating operator to implement the uniquely identifies element or 12 months if Ofcom is relying on technical measures throughout the call chain.</p>
<p><b>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.</b></p>	<p>We agree with all the proposals except that of Network Numbers being only geographic numbers. We appreciate what Ofcom is trying to achieve, but especially since Covid we have seen a larger use of non-geographic numbers being used as network numbers which may have been because of Ofcom's previous intention to clarify that most number types could be used in 2019 (below).</p> <p>Ofcom's proposal on only allowing network numbers to be that of 01/02 is a significant policy shift from the late 2019 consultation which Ofcom was proposing (as per 3.3 of the consultation document<sup>2</sup>) "...we propose that</p>

<sup>2</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0034/176794/consultation-on-the-calling-line-identification-guidelines.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0034/176794/consultation-on-the-calling-line-identification-guidelines.pdf)

any Public Communications Network Number (as defined in the Numbering Plan) can be used as a Network Number, as long as the CLI meets the requirements of the CLI guidelines, as set out in paragraph 2.6 above...". Where a large portion of the respondents appeared to agree with Ofcom's proposal. We're not sure what has changed since then.

We believe there are many bona-fide reasons why a network number should be any 01/02/03/05/07/080 number (more so since Covid). Moreover, in many use cases (especially non-traditional voice lines), we can see non-geographic numbers being the most appropriate to use. We believe this for the following reasons:

1) **Next Generation Voice is not tangibly fixed**

With the PSTN switch off, there is a significant difference between the PSTN and its replacement. In the PSTN you would have a physical telephone line that was a tangible cable delivered to a property. In the Next Generation era, this concept is merely logical and virtual and is not physical as the voice element sits on the IP layer. This means that by its nature it is technically portable and movable. Obviously, the application may dictate otherwise (e.g. a retail voice connection provided through a broadband router is arguably fixed to that broadband connection (even though it goes over the broadband internet connection), but a phone line provided to an IP Phone that could literally be picked up and plugged into any internet connection is certainly not fixed, although in reality and practice it's not a mobile.

2) **Non-geographic numbers can legitimately be the NTP**

Many businesses only want to receive calls to and make calls from their non-geographic number. Technologically (especially in Next Generation Voice networks) there is no reason why they cannot. If it is the only number on the

line (whereby that number itself is only on that line – i.e. the NTP), then that number is indeed unambiguously identifying the true source of the call (exactly as if it were a geographic number had been used).

3) **Many telephony services use Network Number to automatically determine location. Non-geographic numbers introduce a safety net to prompt location selection**

Since Covid, the work from home sector has exploded almost overnight. Many of these users are using hosted services or PBXs (along with SIP Trunking) whereby each employee may be at different ends of the country. We are aware that many innovative inbound telephony applications exist that use the network number to geolocate where a user is calling from. Where the application is unable to locate (i.e. where a non-geographic number is used as a network number), typically it will prompt the user to select where they are calling from, where as if the application presumes they are in a different location, they may find difficulty getting transferred to the correct location. In the above scenario it would make sense to use non-geographic numbers as network networks as you cannot be 100% sure of the actual location of where the user is in terms of geography. It would also be troublesome and administrative intense on CPs if employees of customers had to update their actual geographic network number each time they moved house (especially when their direct line and therefore presentation number is the same non-geographic number). If non-geographic network numbers were removed, then it could leave a scenario where the business and its traditional PBX phone system is appearing to be geographically located in one end of the country and the actual caller is located in another creating difficulties

when the caller is calling certain numbers.

4) **Reducing flexibility could add unnecessary barriers to innovation**

Over the past decade, there has been significant innovation in the UK voice market arguably making the United Kingdom the most advanced technologically and competitive market in Europe and beyond. Although we don't feel these proposals will necessarily damage that standing, what we do feel is that it may create additional hurdles that need to be overcome when innovating by restricting the use of network numbers only to geographic numbers.

5) **Reducing flexibility could increase business confusion**

Customers who currently have a non-geographic number as the NTP number and use this number replacing the NTP number with a geographic number could cause confusion as customers would then have 2 numbers (especially those in a hosted environment or have a single line service). Where the non-geographic number has gone from being the main line number to be an additional number on the line.

If Ofcom does wish to move ahead with the changes, then:

- 1) Given the administrative task involved and renumbering that maybe required within CP networks (along with time required to identify where non-geographic network numbers may be used), then we would expect a 12-18 month time period would be reasonable. This time would also allow various telephony applications that attempt to geolocate using the network number time to update this to the presentation number.
- 2) It would be helpful if Ofcom could confirm whether after any

	<p>implementation period, they would expect CPs (originator, transit and/or terminator) to actively block calls which contain a non-geographic network number (i.e a non-geographic number is NOT a valid number when used as a network number in the context of the CLI guidelines).</p>
<p><b>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?</b></p>	<p>We feel there are very few bona-fide uses for using 084 and 087 as presentation numbers.</p>