

BT response to consultation: Improving the accuracy of Calling Line Identification (CLI) data

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Non-confidential version

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1. Executive Summary

- 1.1. BT welcomes Ofcom's consultation on CLI as part of a wider effort to combat scams facilitated by calls and texts. Preventing the spoofing of CLI data can play a key role in reducing fraud and we support any measures that supports this aim.
- 1.2. As a matter of priority, we are focussing our efforts on ensuring our customers are protected from scammers and spammers. As well as working with industry groups and on government initiatives, we are taking our own measures to solve the problem. Four million customers use our Call Protect service and 5 million have Web Protect. We also introduced Spamshield in 2021, blocking 82 million SMS and reducing scams by an estimated 91%.
- 1.3. We are also implementing new technology to block rogue voice calls and these will be in place by June 2022 for fixed and early 2023 for mobile calls. One of the potential benefits of the move to IP voice services is the ability to block harmful calls in ever more sophisticated ways.
- 1.4. At the same time, we recognise that more can always be done. Customer awareness on initiatives such as the 7726 service is vital if we are to stop the scammers from being one step ahead.
- 1.5. In terms of the specific proposals in this consultation, we broadly support Ofcom's intent and most of what is being proposed are things that we already do. Where a call is clearly invalid, we support the principle that it should be blocked. However, the obligations on providers to block invalid calls is only as good as the mechanism to enforce that obligation.
- 1.6. As Ofcom notes in the consultation in several areas, larger CPs are already doing much of what is being proposed. Ofcom needs to ensure that all CPs comply and should set out how they will ensure that compliance.
- 1.7. There are some areas of detail that we have brought to Ofcom's attention in the response below. These relate, in particular, to:
 - issues with the National Numbering Database;
 - lack of clarity on what Ofcom's expectations are with incoming international calls; and
 - concerns over Ofcom's proposal which would see non-geographic network number CLIs automatically blocked.
- 1.8. We continue to work closely with Ofcom on its industry working group and look forward to assisting it in its wider efforts to prevent scamming and protect consumers.

2. Responses to questions

Question 1: Do you agree with our proposed modification of General Condition 6.6? If not please give reasons

- 2.1. Subject to Ofcom providing clarification on several areas of detail in the guidance to GC 6.6, we support the *intent* of the modifications to General Condition 6.6. However, we believe that there is a textual error in the proposed GC 6.6.
- 2.2. As set out in GC 6.4, a dialable number is one that, by definition, uniquely identifies the caller. In contrast, the text in C6.6 appears to indicate that a number could be dialable but not uniquely identify the caller through the use of the word "or" between "not-dialable" and "does not". We suggest that Ofcom amends the text to reflect this
- 2.3. The wording of GC 6.6 currently – and in the proposed modified version – refers to an obligation on "Regulated Providers". However, Ofcom will be aware that only the originating provider can know if the caller has the authority to use that number. We would suggest, therefore, that the wording of GC 6.6 is changed to reflect this.
- 2.4. On a point of detail on the meaning of "dialable", a number being in an allocated range does not necessarily mean that it is in service and dialable. The only way to check this is to make a chargeable call and only the originating network can make this check. This is not feasible as part of a network solution.
- 2.5. In any case, no downstream network can confirm whether that CLI to be displayed is dialable. It is also difficult to decipher whether calls are 'dialable' when calls enter the UK from abroad. UK-originating networks are responsible for ensuring that the CLI data to be displayed to the called party is 'dialable'. This is achieved either through provisioning/verification by the originating network or through contractual agreement between the customer and the originating network.
- 2.6. Other networks (including those that have international gateways) are unable to ensure that the number to be displayed is 'dialable'.

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

- 2.7. We agree with the timings set out by Ofcom. However, this only has meaning if there is an effective enforcement mechanism in place for those CPs who do not comply with the obligation across originating, transit, and terminating provider functions.

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

- 2.8. We have a number of observations on the proposed changes to the CLI guidance which we set out below. We have also attached a document which sets out specific changes that Ofcom should consider to its published Annex 2: Draft guidance on the provision of Calling Line Identification facilities and other related services.

Format of the CLI should include a 10- or 11-digit number

- 2.9. We already block numbers which are not 10 or 11 digits on our Call Protect service, so we agree with this in principle. However, there are longer CLIs longer which must not be blocked; in particular, second leg priority calls to Emergency Authorities using EA digit prefixes. Ofcom could also consider including in its Guidance that stage 2 Public Safety Answering Points (PSAP) calls are exempt from screening as they are covered as emergency calls.
- 2.10. We are unclear what point Ofcom's is making in paragraph 4.8. Calls to emergency services must display a CLI under the terms set out in General Conditions A3. Those CLIs will therefore need to have a 10- or 11-digit number as set out in this proposal. We are assuming that the last sentence should have stated that calls to emergency services such as 999 are exempt from call screening.

Providers should identify and block CLIs which should not be used for outbound calls (such as by use of the DNO list)

- 2.11. There is a potentially significant issue with the proposal that the National Numbering Scheme (NNS) should determine whether the CLI provided is from a valid range. There are allocated numbers missing from the NNS and this would mean that CPs would be blocking legitimate calls.
- 2.12. We conducted a spot check in February 2022 to illustrate the problem. That found [X]
- 2.13. In terms of using the Do Not Originate (DNO) list, Ofcom notes that the larger CPs (including BT) already block these numbers. We therefore support this guidance but would welcome more details on how Ofcom will enforce this provision for other CPs.

Blocking calls with invalid CLI that originate abroad

- 2.14. We have a significant concern with the proposed guidance as set out in paragraphs 4.20-4.21. As Ofcom sets out, there may be genuine and legitimate reasons why a caller withholds their number when calling from overseas. The proposals as they stand could see those legitimate calls blocked in cases where the international CP sending the call into the UK is unable, for legal or technical reasons, to send the CLI with restriction marker. It is unclear to us how "work[ing] with international partners" represents a sufficiently effective mitigation to stop this from happening. This

especially the case as a number of mostly smaller CPs will not have relationships with overseas CPs.

- 2.15. Ofcom will be aware that ND1016 was issued prior to the publication of the current Ofcom CLI Guidance. It states that the only case of a received NN CLI being overwritten is where a fault exists and so is only provided on a temporary basis.
- 2.16. A NN CLI is injected only where one was not received and the Presentation Number (PN) CLI information is 'valid'. Ofcom is, therefore, incorrect in their understanding that the injected NN (and its 'restricted' privacy marking) has any bearing on display. (ND1016 states the PN CLI information is always used for display purposes.)
- 2.17. It is unclear from the proposed changes to the guidance what role, if any, the 08979 prefix will have in future international calls. At present, CPs can inject the 08979 number to international calls which are considered to be unreliable and/or absent. We could, however, interpret paragraph 4.19 as removing this practice as it states that CPs should block numbers that it considers contain an invalid CLI. We understand from separate industry discussions that the 08979 number would not be used in future if these proposed changes were confirmed but would welcome clarity on this from Ofcom.
- 2.18. We send calls to CPs that are outside of the EU without appropriate privacy assurances and where the caller withheld their CLI. In these instances, we abide by the EU privacy directive and remove the CLI. If the receiving network applied the same rules as are being proposed by Ofcom, then they would fail all these calls. This appears to strengthen the argument to retain 08979 and not block calls where there is no CLI.

Blocking calls with invalid CLI that originate abroad

- 2.19. There are risks with the proposal in paragraph 4.24 that non-UK originators should not use a UK CLI except in limited legitimate use cases. We cannot determine a legitimate use case since networks that use a UK CLI as an NN are deemed to be a UK CP. In those cases, we would have to be connected to the UK network at a domestic level.
- 2.20. Ofcom is proposing use of pre-agreed interconnects for these calls with UK CLI. This is likely to be all that can be done in practice, and it may deliver some clear benefits. However, UK originated calls to outside UK that are diverted back to UK will be put at risk of being blocked. This is because the probability of the providers being able to use pre-agreed routes for all of these scenarios is close to zero. We also question how practical it is in reality for UK providers to work with international originators who blank CLIs for privacy reasons.
- 2.21. Paragraph 4.28 states that blocking calls that spoof a UK CLI NN CLI will reduce the number of harmful calls. We are doubtful that this is the case in reality as it will be simple for scammers to switch to spoofing non-UK CLIs or UK Mobile CLIs as NNs and continue using UK CLIs as PNs. We would be further grateful if Ofcom could clarify that ND1447 blocking must be applied by all international gateway operators to all international calls where the destination is a UK number hosted on any CP network.

Use of non-geographic numbers as Network Numbers

2.22. We are unclear what role Ofcom envisages with its proposal in paragraph 4.41 for non-geographic numbers that are supported by the fixed network. Examples of these numbers include 056 - location independent electronic communication services which were introduced by Ofcom for VoIP users; 03 numbers - used for business IP-originated and terminated calls, and 055 – corporate numbering. The proposed guidance appears to state that CPs should block these calls. However, we are unclear whether this is Ofcom's intent. We would welcome further clarity from Ofcom on this proposed change to its guidance.

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?

2.23. We support this proposal.