

Improving the accuracy of Calling Line Identification (CLI) data

Consultation on changes to the General Conditions and supporting guidance on the provision of CLI facilities

KCOM response – 20 April 2022

1. KCOM Group Ltd (“KCOM”) welcomes the opportunity to comment on Ofcom’s consultation document about improving calling line identification (“CLI”) data (“Consultation Document”)¹.
2. KCOM supports Ofcom’s stated policy objective, to prevent scam calls from reaching consumers and ultimately to reduce the risk of people being scammed. As Ofcom is aware, KCOM is already engaged in screening calls to prevent scam calls from reaching customers. Except for calls using the priority flag to known emergency services CLIs, or to KCOM range CLIs which have been exported, the presentation and network CLIs of incoming traffic are screened against various blocking lists. These lists have been compiled using various sets of data from sources including Ofcom, such as the full DNO list and allocated number list, ITU for country codes, and the numbers that we have investigated and decided to block for nuisance or scam behaviour following investigations triggered through manual monitoring of traffic and customer reports.
3. In section 3 of the Consultation Document, Ofcom proposes to amend General Condition (“GC”) C6.6, to require providers, where technically feasible, to identify and block calls with CLI data which does not uniquely identify the caller. In Ofcom’s view, this would bring consistency between the obligations in GC C6.4 and GC C6.6.
4. Ofcom’s analysis of the impact of the proposed amendment to GC C6.6 and the related changes to the CLI guidance (set out in section 4 of the Consultation document), is set out in paragraphs 3.11 – 3.16. We note that Ofcom has not sought to quantify the benefits of the proposed changes, on the basis that they are part of a wider package of measures – by Ofcom, other regulators, government and industry – designed to disrupt scams in general and reduce harm². The assumption appears to be that there are no costs, in the broad sense, associated with the proposals.
5. KCOM does not seek to oppose the proposed change to GC C6.6, or the resulting amendments to the proposed CLI guidance. However, we do think that there is a likelihood that there are a volume of calls, which are not scam calls, but which, nevertheless, have CLIs which do not conform to GC 6.4 and which would, therefore, be blocked if the proposed changes to GC 6.6 and the CLI guidelines are made. To the

¹ Improving the accuracy of Calling Line Identification (CLI) data, Ofcom, 23 February 2022:

https://www.ofcom.org.uk/data/assets/pdf_file/0015/232071/consultation-improving-cli-data-accuracy.pdf

² Paragraph 3.12 refers



extent that these calls provide a legitimate benefit to either the calling or called party, it seems to us that there is a risk that the proposed changes could generate a disbenefit (i.e., cost), if they result in such calls being blocked.

6. We have assessed the proportion of calls currently terminated by KCOM which would be blocked if Ofcom gives effect to the proposed changes. To assess the impact of blocking national calls on incorrect number length, we re-enabled (for monitoring rather than actually blocking) a check that had previously been turned off due to issues with short code CLIs, between 18th and 24th March 2022. That check revealed that an additional 2.7% of calls would be blocked if Ofcom gave effect to its proposals. Given the scale of the volume of calls that percentage represents, we believe that it is highly likely that some of them of them at least were genuine.
7. It is possible that none of the calls that would stand to be blocked by virtue of Ofcom's proposals provide any legitimate benefit to the calling or called party, but given the volume of such calls, this seems to us to be unlikely. And we concede that we do not know the proportion of such calls that are likely to conform to the requirements of GC 6.4, if the proposed changes to GC 6.6 and the CLI guidelines are made (i.e., the extent to which originating operators will make changes to secure compliance with GC C6.4).
8. It seems to us, though, that these are issues that merit further consideration by Ofcom in order to satisfy itself that it is acting in accordance with section 3(3) of the Communications Act 2003 (i.e., that it has regard to the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed, as well as any other principles appearing to Ofcom to represent best regulatory practice).

