

Your response

Question	Your response
Question 1: Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.	No comments.
Question 2: Do you agree with our proposal to bring this modification into force six months after the publication of our statement (which	No comments.

is planned for Autumn 2022)? If not, please provide reasons why a different date would be appropriate.

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.

Re: Do-Not-Originate (Para. 4.10 - 4.15)

Neustar is a leading provider of Trusted Call Solutions to Service Providers and Enterprises, providing information, tools, and services to enhance and protect the calling experience.

Within the Enterprise portfolio, Neustar helps Enterprises register their vetted identity, telephone numbers, use cases, and related attributes with Service Providers and their Call Analytics partners for the purposes of better informing them to improve their effectiveness. This includes informing Service Providers and their Call Analytics partners of Do Not Originate numbers, where Enterprises have established or are in the process of establishing certain Telephone Numbers for outbound only calls.

The implementation of Do Not Originate capabilities by Service Providers and Enterprises is a growing best practice throughout the industry because it is a proven and effective tool for protecting Consumers from fraudulent calls.

Neustar supports efforts to expand the adoption of Do Not Originate capabilities throughout the ecosystem, and applauds Ofcom and Service Providers for their leadership in these areas.

Re: Display name information (Para 4.45 - 4.50)

Neustar is the leading provider of Caller Name services to Service Providers the United States, providing them with the highest quality Caller Names, namely those sourced and validated by the Service Providers themselves.

Neustar supports the use of Display Name capabilities, for two primary reasons. The first reason is that Display Name enables Service Providers to provide Caller Reputation (e.g., Scam Likely) to warn / inform Customers about potentially fraudulent calls at scale. The second reason is that Display Name enables Service

	<p>Providers to provide Caller Name services to customers at scale. The ability to convey this data in call signalling for native display on landline and mobile devices provide the scale required to ensure the success of these services.</p> <p>Neustar agrees with the perspective, as noted in the Consultation, that any solution must ensure the accuracy of the Caller Name being presented to Customers. Accordingly, Neustar recommend two implementation approaches.</p> <p>The first approach, similar to the implementation in the United States, is to establish a federated authoritative database that contains Caller Names provided and validated by the Service Providers themselves. When coupled with an implementation that ignores any Caller Names provided in call signalling, this approach significantly limits the opportunity for fraud and other abuse.</p> <p>The second approach is to leverage Secure Telephone Identity Revisited (STIR) with Rich Call Data (RCD). The former cryptographically signs the Calling Party number, and the latter cryptographically signs the Caller Name and other identity-related attributes for presentment to the Called Party.</p> <p>These two approaches are not mutually exclusive. Rather, the first approach can establish the ecosystem and integrations required to share trusted data among the Service Providers and the second phase adds additional security and content considerations to the solution.</p>
<p>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?</p>	<p>No comments.</p>