

## Your response

Question	Your response
<p><b>Question 1: Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.</b></p>	<p><i>Is this response confidential? – No</i></p> <p>Yes, we support the changes to C6.6. SSUK believe that any measures to improve trust in Call Line Identity (CLI) are welcome.</p> <p>Existing measures deployed by the industry have already changed the tactics used by offenders, with the presentation CLI frequently changing or in some cases causing prior victims or random consumers to receive calls from parties that have been targeted.</p> <p>In many cases, we understand there will be a clear mismatch between the presentation and network CLI of the call. Providing operators with an opportunity within the General Conditions to prevent such calls being connected has the potential to reduce the harm caused by scam calls.</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><i>Is this response confidential? – No</i></p> <p>SSUK is not well placed to comment on the implications of the proposed timeframe. Although we support the timely revision of the modification as scam calls continue to cause significant detriment to the wellbeing of citizens, we recognise that operators will need time to implement the changes and build these into workplans.</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><i>Is this response confidential? – No</i></p> <p>Yes, we support a change to the guidance in respect of CLI. We believe that UK originated calls should, as per the guidance always have a 10- or 11-digit CLI associated with them.</p> <p>We support guidance that the CLI data provided with a call should contain a valid and dialable number. Specifically, we strongly support guidance that the DNO list should be used by operators to identify, and block spoofed calls.</p>

	<p>The spoofing of numbers which are principally used for inbound calls to our members continues to an aspect of impersonation fraud. Leading to significant harm and a variety of outcomes in terms of financial detriment.</p> <p>We support the Blocking calls with invalid CLI that originate abroad. Calls of this nature continue to be an issue and whilst the malformed non-UK CLI may well reduce the likelihood of detriment it does not eliminate it.</p> <p>We support the proposed changes to the guidance for calls originating from abroad that use a UK CLI. Whilst we agree this will eliminate threat, we agree with Ofcom that it should reduce the volume of potentially harmful calls.</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><i>Is this response confidential? – No</i></p> <p>We support the proposed steps to mitigate the potential for consumer harm due to concerns about call costs.</p>

Please complete this form in full and return to [scamsconsultations@ofcom.org.uk](mailto:scamsconsultations@ofcom.org.uk) .