

## **NON-CONFIDENTIAL VERSION**

### **Improving the accuracy of Calling Line Identification (CLI) data**

### **Ofcom consultation on changes to its General Conditions and supporting guidance on the provision of CLI facilities**

### **Response by TalkTalk Group**

**Submitted on 27 April 2022**

TalkTalk welcomes the opportunity to comment on Ofcom's proposals to improve the accuracy of Calling Line Identification (CLI) data. Our comments are set out below in relation to each of the specific questions raised in Ofcom's consultation document.

**1. Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.**

Yes. It is vitally important that consumers can trust the CLI data displayed on any call that they receive and all providers (including originating, transit and terminating providers) need to make sure the CLI data transmitted on their network is accurate, valid and dialable.

The accuracy of CLI data forms a cornerstone in the ongoing efforts to tackle scam calls in the UK. By strengthening the CLI rules and Ofcom ensuring that providers adhere to them, it will become increasingly difficult for fraudsters to make scam calls to UK consumers.

Ofcom's proposals represent a major step forward in that they will require providers to block calls originating from abroad that use a UK telephone number as a Network Number/CLI.

**[redacted]**

Fraudsters intent on making scam calls will always try to find alternative routes to carry their calls via other networks which enables them to continue with their criminal activities.

TalkTalk is therefore very pleased to see that Ofcom is now proposing this explicit change to the CLI guidance. This is a very practical step which will have a direct, positive impact on the number of scam calls reaching UK consumers.

- 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.**

TalkTalk agrees with the proposal to bring this modification into force six months after the publication of Ofcom's statement. Network operators should not be allowed to delay further the introduction of this essential amendment to the guidance. The sooner the guidance is implemented, the sooner UK consumers will benefit from this vital change to protect them further from scam calls.

- 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.**

We agree with the proposed changes to the CLI guidance. We do believe, however, that further improvements to the CLI guidance are warranted to address the problem of invalid UK telephone numbers being used as presentation CLIs for calls originating abroad. We note Ofcom's comment that "*legitimate calls from overseas, such as call centres that operate on behalf of a UK business, will not be blocked*" due to the exemption in paragraph 4.17 of the proposed CLI guidance "*for calls from UK customers hosted onto an overseas node.*"<sup>1</sup> We are concerned that this wording of the proposed CLI guidance keeps open a potential loophole for scam callers, who will be able to continue their activity simply by using an international telephone number as the network CLI alongside a UK telephone number as the presentation CLI.

We would suggest that this exemption should be restricted to call centres abroad who use telephone numbers allocated to them by their chosen UK carrier and route such calls directly to that UK carrier. It should not be possible for such call centres to choose carriers who may use telephone numbers which Ofcom has not allocated to them. Any resilience concerns by the relevant call centre could still be addressed by using an alternative carrier but even in this case, that carrier should only be allowed to use their own telephone numbers to populate the CLI data.

In the absence of this clarification, we are concerned it would still be open for scammers located in another country to reach UK consumers by falsely using UK telephone numbers in the presentation CLI, as UK CPs will have no way to distinguish genuine calls from scam calls. We are not aware of any other proposed solutions that would effectively tackle the issue of internationally originated scam calls in an effective manner. Without these further controls on presentation numbers used, we believe that the changes propose by Ofcom are unlikely to deliver all possible material benefits in the form of a reduction in scam calls (or improved confidence in CLIs and trust in telephone services in general).

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<sup>1</sup> Ofcom consultation document, paragraph 4.27.

- 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?**

The service charges for calls to 084 numbers may be cheaper than the service charges for 09 numbers but it is important to remember that access charges can be as high as 60ppm (will vary by provider of course) which is likely to cause bill shock when a user calls back the presentation number. We would therefore argue that all non-geographic numbers which attract an access charge (i.e., 084, 087, 09, 118) should be treated in a similar way to 09 numbers in terms of the rules on presentation numbers.