

Your response

TELECOM2 LTD RESPONSE



About Telecom2

Telecom2 are a voice network carrier with offices in London and Spain. Through the group of companies our focus is to be at the forefront of technology, specialising in VoIP B2B and call centre solutions. T2 also specialise in micro payments across mobile, card services and age verification.

Telecom2 has a broad spectrum of clients including a number of Contact Centres, Print media companies, Charities, TV companies and a Premiership Football club.


We also still have some of the traditional clients on 09 PRS running Adult, Psychic and Competition services.

We have achieved PCIDSS, Cyber Security and ISO27001 certification and are working towards ISO9001 certification with the expectation this will be achieved this year.

We welcome this opportunity to contribute to the formal consultation exercise. Our comments are based on internal knowledge and discussions with clients and other CPs

Question	Your response
Question 1: Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.	<p><i>Is this response confidential? – No</i></p> <p>There is a lot about what to do but nothing about how to do it. Provided the amendments continue to say where technically and economically feasible we would have no problem with the modification.</p> <p>It is worth noting that, despite comments in the consultation that some CPs are blocking calls with invalid CLI, we regularly receive calls from and via BT and the MNOs that contain invalid CLI and there are reciprocal charges available for such calls in the Carrier Price List</p>
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	<p><i>Is this response confidential? – No</i></p> <p>We have no problem with the modification being brought into force in six months but if it is</p>

<p>pro-vide reasons why a different date would be appropriate.</p>	<p>to be implemented CPs will need technical and possibly financial assistance. It is not true to say the cost will be low. We have examined how to implement the change, it will require us to purchase, program and install significant amounts of new equipment at a time when we are also managing the change to IP telephony.</p>
<p>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.</p>	<p><i>Is this response confidential? – No</i></p> <p>We have some sympathy with the motive for the changes having had a number of our CLI spoofed but we have concerns about the feasibility of them.</p> <p>As above, we are not convinced that many providers have the resource and ability to actually implement the required verification and blocking of calls.</p> <p>As a point of interest, nearly all the spoofed Telecom2 CLI have been numbers that would have been classed as valid, being working numbers allocated to and in use by clients.</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><i>Is this response confidential? – No</i></p> <p>With one reservation we see no problem with having 084 and 087 numbers as valid numbers for Business’s Presentation CLI. For example, they enable members of a sales team to have a common CLI that, when called, is answered by a sales team call centre. Callers will be aware that the call is to a business, as opposed to Geographic and mobile numbers which don’t have that connotation. 03 numbers may also be used in this way but there is far less public awareness of 03 numbers and their purposes.</p> <p>We do not believe that the potential for consumer harm caused by the very low service charges attached to 07 and 084 numbers is significant or even material. The numbers will reflect the calling entity and are more easily found using on line search engines as they are often given in publicity for the Business. They will also look more like a business than Geographic or mobile numbers.</p>



Our reservation is that while the service charges for 084 and 087 are very low and should not in themselves cause bill shock, the associated access charges can be very high, up to ten times the service charge. Enquiries from client's customers show that this is not well understood by consumers, they don't realise that access charges are not linked to the called number or even that they exist.