

Consultation response form

Please complete this form in full and return to scamsconsultations@ofcom.org.uk.

Consultation title	Improving the accuracy of Calling Line Identification (CLI) data
Full name	[REDACTED]
Contact phone number	[REDACTED]
Representing (delete as appropriate)	Organisation
Organisation name	Three UK
Email address	[REDACTED]

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	The highlighted sections below are confidential
For confidential responses, can Ofcom publish a reference to the contents of your response?	

Your response

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>Three UK fully supports Ofcom's effort to improve accuracy of CLI data in order to combat scam calls with spoofed CLI. Therefore,</p>

	<p>Three UK agrees with the proposed modification of General Condition C6.6.</p>
<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 provide reasons why a different date would be appropriate.</p>	<p><i>Is this response confidential? – No</i></p> <p>In our experience it is not possible to fully implement the CLI guidance requirements on legacy network technology (e.g. TDM, ISUP, BICC) due to the capability of the legacy equipment.</p> <p>The new SIP technology and products provide much more flexibility for implementing the CLI guidance requirements.</p> <p>Three and the wider industry are making good progress in migrating interconnect Voice traffic from legacy technologies to SIP but there is a possibility that a minority of traffic will still be on legacy interconnects beyond the proposed implementation date.</p> <p>Three would suggest that Ofcom acknowledges that legacy technology/product limitations could impair Carriers' ability to fully comply with the CLI guidance requirements or alternatively to extend the deadline to allow for the technology migrations to complete.</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? – Yes</i></p> <p>Three UK agrees with the proposed changes to the CLI guidance. In the Three UK SIP-based network, the proposed changes are [REDACTED]. Limitations exist in the legacy network as mentioned in the response to question 2.</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>Three UK does not own or use 084 and 087 number ranges. We have no objection to Ofcom's proposal to prohibit their use as Presentation Numbers if this is in the best interest of end users.</p>

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