

Your response

Question	Your response
<p>Question 1: Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.</p>	<p>We agree with the proposed amendments, but the existing requirements aren't being complied with, and in one area your proposals don't go far enough.</p> <p>CLI by default</p> <p>In paragraph 2.8 of the consultation document you say that GC C6 requires providers to provide CLI facilities by default. This is not happening.</p> <p>We sell call blocking equipment that is used by police forces and local authorities to protect older and vulnerable people. We often get reports that when they install trueCall devices Caller-ID is not enabled on the phone line. They have a real problem getting it turned on because in many cases the subscriber doesn't have sufficient capacity to call the provider to turn it on. Sometimes when they are able to do this the provider uses the opportunity to try to get them to renew their contract which is inappropriate. In other situations the installer calls the provider to get the service turned on, but this is refused because they are not the bill payer.</p> <p>This is all unnecessary work that could be avoided if caller ID were turned on by default by all providers as required.</p> <p>Returned calls</p> <p>Paragraph A1.24 of Ofcom's persistent Misuse statement says:</p> <p>Where a person calls the CLI provided and is connected to an agent or an automated message, we may also regard it as misuse if:</p> <ul style="list-style-type: none"> • no information is provided about the organisation which called, or the organisation on whose behalf the call was made; • an opportunity is not provided for the person called to opt out of future unsolicited marketing calls or messages; or • the call is used as an opportunity to market to that person, without their consent. <p>These requirements were introduced many years ago so the industry has had an opportunity to put the required processes in place. We believe that these requirements should now be incorporated in General Condition C6.6.</p> <p>There is a significant benefit in doing this – scammers don't want to be contactable via a returned call. If these requirements were put in place then a consumers and providers would have a very simple way of checking whether a caller was not legitimate – they just need to make a call to the number. If the call is not connected or if it is connected and the called party fails to identify themselves properly then this is clearly not a legitimate caller.</p>
<p>Question 2: Do you agree with our proposal to bring this modification into force six months after the publication of our statement</p>	<p>Yes</p>

<p>(which is planned for Autumn 2022)? If not, please provide reasons why a different date would be appropriate.</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>We agree with these proposals, but we think that they should be incorporated into General Condition C6.6.</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>We have carried out some analysis of the trueCall database to give feedback on this.</p> <p>The trueCall database holds CDRs from trueCall users who have agreed to share their data with us. Currently 10,000 trueCall users contribute this data, sending us approx. 500,000 incoming call records per month. We have an algorithm that identifies which calls are likely to be nuisance/scam phone calls so we can identify what proportion of these calls arrive with an 084 and 087 prefix.</p> <p>The tables below show the stats. In summary:</p> <p>084 numbers: Around 0.05% of incoming calls arrive with a 084 prefix, and 60% of these are likely to be nuisance calls. The 084 number range includes the 08456021111 number which is BT's landline text notification service so we have excluded this from our analysis.</p> <p>087 numbers: Around 0.03% of incoming calls arrive with a 087 prefix, and 33% of these are likely to be nuisance calls. It is interesting that many trueCall users have 087 numbers on their welcome caller lists suggesting that they welcome these calls.</p> <p>It appears from this analysis that calls arriving with caller-IDs starting 084 and 087 do not make up a significant proportion of calls received by UK consumers.</p>

Percentage of all incoming calls received by trueCall users that have an 084 prefix excluding BT's landline text notification service

(sample size approx. 500,000 calls per month)

Month	Good calls	Nuisance calls	All calls
Jan-19	0.03%	0.04%	0.08%
Feb-19	0.04%	0.06%	0.09%
Mar-19	0.04%	0.04%	0.08%
Apr-19	0.03%	0.05%	0.08%
May-19	0.03%	0.05%	0.08%
Jun-19	0.03%	0.03%	0.07%
Jul-19	0.02%	0.04%	0.07%
Aug-19	0.02%	0.04%	0.06%
Sep-19	0.02%	0.06%	0.08%
Oct-19	0.02%	0.05%	0.07%
Nov-19	0.02%	0.03%	0.05%
Dec-19	0.02%	0.03%	0.05%
Jan-20	0.02%	0.03%	0.05%
Feb-20	0.02%	0.02%	0.05%
Mar-20	0.02%	0.01%	0.03%
Apr-20	0.02%	0.01%	0.03%
May-20	0.01%	0.01%	0.02%
Jun-20	0.02%	0.03%	0.04%
Jul-20	0.02%	0.04%	0.06%
Aug-20	0.01%	0.04%	0.06%
Sep-20	0.01%	0.04%	0.06%
Oct-20	0.02%	0.06%	0.07%
Nov-20	0.01%	0.04%	0.06%
Dec-20	0.01%	0.03%	0.04%
Jan-21	0.01%	0.04%	0.05%
Feb-21	0.01%	0.03%	0.04%
Mar-21	0.01%	0.05%	0.06%
Apr-21	0.01%	0.05%	0.06%
May-21	0.01%	0.02%	0.03%
Jun-21	0.02%	0.02%	0.04%
Jul-21	0.01%	0.01%	0.02%
Aug-21	0.01%	0.02%	0.04%
Sep-21	0.01%	0.02%	0.03%
Oct-21	0.01%	0.02%	0.03%
Nov-21	0.01%	0.02%	0.03%
Dec-21	0.01%	0.02%	0.03%
Jan-22	0.01%	0.02%	0.03%
Feb-22	0.02%	0.01%	0.03%
Mar-22	0.00%	0.01%	0.02%

Percentage of all incoming calls received by trueCall users that have an 087 prefix

(sample size approx. 500,000 calls per month)

Month	Good calls	Nuisance calls	All calls
Jan-19	0.01%	0.00%	0.01%
Feb-19	0.01%	0.00%	0.01%
Mar-19	0.01%	0.00%	0.01%
Apr-19	0.00%	0.00%	0.01%
May-19	0.01%	0.01%	0.01%
Jun-19	0.00%	0.00%	0.01%
Jul-19	0.00%	0.00%	0.01%
Aug-19	0.01%	0.00%	0.01%
Sep-19	0.01%	0.00%	0.01%
Oct-19	0.02%	0.01%	0.03%
Nov-19	0.02%	0.05%	0.07%
Dec-19	0.02%	0.02%	0.04%
Jan-20	0.02%	0.01%	0.04%
Feb-20	0.04%	0.01%	0.05%
Mar-20	0.01%	0.01%	0.02%
Apr-20	0.02%	0.00%	0.03%
May-20	0.03%	0.00%	0.04%
Jun-20	0.03%	0.01%	0.04%
Jul-20	0.02%	0.02%	0.04%
Aug-20	0.03%	0.01%	0.04%
Sep-20	0.05%	0.02%	0.07%
Oct-20	0.01%	0.02%	0.03%
Nov-20	0.02%	0.01%	0.03%
Dec-20	0.02%	0.01%	0.03%
Jan-21	0.02%	0.01%	0.03%
Feb-21	0.02%	0.01%	0.03%
Mar-21	0.01%	0.01%	0.02%
Apr-21	0.02%	0.02%	0.04%
May-21	0.03%	0.01%	0.04%
Jun-21	0.02%	0.02%	0.04%
Jul-21	0.03%	0.01%	0.04%
Aug-21	0.02%	0.00%	0.02%
Sep-21	0.03%	0.01%	0.04%
Oct-21	0.02%	0.01%	0.03%
Nov-21	0.02%	0.01%	0.03%
Dec-21	0.03%	0.01%	0.04%
Jan-22	0.04%	0.00%	0.04%
Feb-22	0.03%	0.01%	0.03%
Mar-22	0.02%	0.01%	0.02%