

Improving the accuracy of Calling Line
Identification (CLI) data and the
Good practice guide to help prevent misuse of
sub-allocated and assigned numbers

UKCTA Response

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Introduction

1. UKCTA is a trade association promoting the interests of fixed-line telecommunications companies competing against BT, as well as each other, in the residential and business markets. We advocate regulatory outcomes designed to serve consumer and business customer interests, particularly through competition to Ofcom and the Government. Details of the membership of UKCTA can be found at www.ukcta.org.uk. Some of our members provide communications services to the full range of consumer and business customers in the UK. Other members focus on services to the corporate market only.
2. UKCTA is pleased to have the opportunity to respond to Ofcom's Consultation Improving the accuracy of Calling Line Identification (CLI) data and the accompanying Good Practice Guide¹.
3. We are supportive of the overall objectives of the proposals. Our members are committed to the clear objective of reducing the risk of consumer harm from scam calls and texts.
4. The key elements of our response are set out below.
5. We believe the guide includes some helpful suggestions for those Communications Providers who have yet to fully implement processes to ensure they know their business customers and how numbers will be used by them before numbers are transferred.
6. Our members consider the guide can be used to help plan and focus the development of suitable processes. CPs who have already implemented robust and efficient processes should not be required to implement new processes.
7. Amongst other things the risk profile of business customers should be considered. For example, it is not proportionate to require CPs to implement new and highly prescriptive processes for corporate and enterprise customers. These types of customers will have low risk profiles with regard to number misuse.
8. By definition, the measures mentioned in the guide are only suggestions and we would not want Ofcom to be prescriptive on measures CPs are expected to implement to ensure their compliance with their regulatory obligations. Rather, Ofcom should focus its guidance on encouraging CPs to support the principle of assigning numbers to low risk and/or reputable customers, while allowing them flexibility to define the relevant measures for their customer base and service offerings.
9. Know your customer (KYC) is fundamental to ensure CPs are confident on how their customers use valid numbers. Using a third-party risk management vendor could ensure a high level of consistency in the approach taken by CPs while removing the burden from them - we encourage Ofcom to consider this further.

¹ Some of our members have submitted individual responses.

Specific comments proposed changes to the CLI guidance:

10. We would welcome clarification in relation to the length of the CLI when the country code is included - specifically for the use of E.164 format (which is longer than 10/11 digits) which should be considered valid and therefore not blocked. These numbers are valid, dialable and will uniquely identify the caller.
11. We support the exemptions to the proposed rules regarding calls from outside the UK with UK Network Numbers regarding legitimate use cases which would protect both international and UK customers in certain legitimate call scenarios (e.g., call from UK to US office which is call forwarded to a mobile roaming in the UK). Whilst supporting the principle of this proposal, these exemptions add significant complexity and cost to building a blocking system. We therefore question whether this rule is really proportionate. Focusing on the DNO and protected numbers lists would be more productive and easier to implement. We would ask Ofcom to reconsider this point.
12. We support the prohibition of using 084 and 087 non-geographic numbers in presentation numbers.
13. We invite Ofcom to consider that numbers starting with 033 and 0300 should also be treated as valid for both presentation and network number. These ranges do not cause harm as they are geo-linked in terms of price should a recipient call them back and can be linked to a valid geographic location.

End