



**Enterprise  
Telecom**  
Consultants

Corporation Secretary  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

Versailles, May 3, 2023

N. Ref: Letter to Ofcom 20230503

Subject: your public consultation on Calling Line Identification (CLI) authentication

Dear Madam, dear Sir,

I have read with utmost interest the public consultation document issued by Ofcom on Friday, April 28, 2023, on a potential future approach to detecting and blocking spoofed numbers.

My vanity has been flattered by your quotes of my blog post : [Number Authentication: What is the situation in the US? In France?](#) However, I would like to draw your attention on the fact that many important events took place in France about Number Authentication which your document does not reflect.

ARCEP numbering plan update of 2019 ([ARCEP decision N° 2019-0954](#)) did create a number category called “Authenticated Multipurpose Numbers”, in order for operators to experiment number authentication. See section 9 of the decision and section 2.3.8 of its annex 1.

However the decisive piece of legislation about number authentication in France has been article 10 section III of the so-called Naegelen law ([law N° 2020-901 of July 24, 2020](#)). While ARCEP had created conditions for a voluntary experiment, the legislator introduced a full obligation for originating operators to authenticate all outgoing calls and a full obligation for transit and terminating operators to break all unauthenticated calls. These obligations are coming into force on July 25, 2023, three years after the publication of the law.

The common-sense limitations to these blunt obligations which your document mentions (exclusion of emergency calls and non-SIP calls) as well as other ones (e.g. diverted calls) have been introduced by operators. Operators have decided not to fully apply the law when its requirements were unrealistic.

Your document also mentions about France that “Legacy networks [are] to be decommissioned by launch date”. Unfortunately, this is not true. Orange still plans to run 227 TDM local switches (what BT would call DLEs) by mid-2025, and the 15% of fixed calls placed by customers served by these switches will not be authenticated. Moreover, the vast majority of mobile voice calls are still 2G/3G powered, which makes them unfit for number authentication.

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In a nutshell, regarding number authentication, ARCEP was as prudent as Ofcom is, the legislator was bold and unencumbered with details, and operators are going to introduce number authentication roughly on time, but only for SIP calls, breaking the law when it is unrealistic.

I kindly recommend that you update your consultation document to reflect these facts, because ignoring them could result in a wrong appreciation by British stakeholders of what it takes to successfully implement number authentication.

Yours sincerely

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end.

Emmanuel Tricaud  
Gérant  
Enterprise Telecom Consultants

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## Annex: Extract from Ofcom document “Calling Line Identification (CLI) authentication: a potential approach to detecting and blocking spoofed numbers” with proposed amendments

### France

- A1.29 In July 2019, the communication regulator, Autorité de Régulation des Communications Electroniques (ARCEP) published a decision to amend the numbering plan to include several measures, including an opening to an experimental introduction of a number authentication mechanism to protect users against fraud and theft.<sup>201</sup> In July 2020, law n°2020-901 was passed, which mandated number authentication for all phone calls. The deadline for introduction of authentication is the 25 July 2023.
- A1.30 The ~~French~~ approach followed by French operators differs from the US and Canada where the introduction has been phased, with an initial focus on IP network voice calls; the ~~French~~ approach of French operators is to have limited exceptions in the initial phase. Legacy technologies are ~~not~~ excluded from the initial phase but are expected to have been as they are not retired prior to implementation of the solution. In addition to this, a common platform is being delivered to provide the capabilities equivalent to the STI-PA and STI-CA (see Table A.3 below).

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<sup>199</sup> Quarterly traceback report #4 (TIF 38)

<sup>200</sup> Compliance and Enforcement and Telecom Decision CRTC 2021-123

<sup>201</sup> Arcep Decision No. 2019-0954

**Table A.3: French governance roles**

Role	Key characteristics
<b>Governance Authority (STI-GA)</b>	Oversight role (APNF and ARCEP); defines policies on who can acquire certificates, rules relating to certificate management including approved and revoked operators.
<b>Policy Administrator (STI-PA)</b>	Platform MAN <sup>202</sup> made up of several logical components that provide the equivalent capability with the addition of a monitoring database for the feedback of traces, incidents, reports and metrics from operators related to the MAN framework. <sup>203</sup>
<b>Certificate Authority (STI-CA)</b>	
<b>Database of Signals and Measurements</b>	

A1.31 French operators and ARCEP have requested the Association de la portabilité des numéros fixes<sup>204</sup> project manage the delivery of the project, called MAN.

A1.32 Accompanying capabilities Call tracing will be supported through the introduction of the Platform MAN. Data collected will support the ability to standardise the approach to call tracing.

### Current Status and ongoing developments

A1.33 We understand that work is ongoing in preparation for the introduction in the summer of this year.

#### 1. International summary comparison

A1.34 Table A.4 summarises some of the key aspects that make up the CLI authentication approaches described above.

**Table A.4: International summary comparison**

	US	Canada	France
<b>Governance Authority</b>	New legal entity made up of national operators. <sup>205</sup>	New legal entity made up of national operators. <sup>206</sup>	Existing legal entity made up of national operators. <sup>207</sup>

<sup>202</sup> Mécanisme d'authentification du Numéro (MAN): Number Authentication Mechanism

<sup>203</sup> Enterprise Telecom Consultants 2018. [Number Authentication: What is the situation in the US? In France.](#)

<sup>204</sup> APNF - Fixed Number Portability Association made up of 9 French operators

<sup>205</sup> [US Secure Telephone Identity Governance Authority](#)

<sup>206</sup> [Canadian Secure Token Governance Authority](#)

<sup>207</sup> Association de la portabilité des numéros fixes (APNF) - Fixed Number Portability Association, an association made up of operators using numbering resources belonging to the French telephone numbering plan. APNF supports several services including fixed number portability.

	US	Canada	France
<b>Policy Administrator</b>	Commercial entity <sup>208</sup>	Commercial entity <sup>209</sup>	Existing legal entity made up of national operators <sup>210</sup>
<b>Certificate Authority</b>	Commercial entities, 10 Certificate Authorities <sup>211</sup>	Commercial entities, 2 Certificate Authorities <sup>212</sup>	Existing legal entity made up of national operators <sup>213</sup>
<b>Terminating Network - behaviour for unsigned or invalidly signed calls</b>	Communicate information to end-user to allow them to decide.  In some cases, disconnect the call.		Disconnect the call (excludes emergency, <u>diverted</u> and non-SIP calls) <sup>214</sup>  With exceptions of 'Breakable calls' <sup>215</sup>
<b>Number of Attestation Levels</b>	3 (A -Full, B -Partial, and C -Gateway)		1 (not blocked) A attestation <sup>216</sup>
<b>Approach to Legacy networks (TDM)</b>	Work in progress on potential technical alternatives		Legacy networks to be decommissioned by <del>launch</del> <u>date2030</u>
<b>Call Tracing</b>	Existing legal entity made up of national operators  Industry Traceback Group (ITG) <sup>217</sup>  Spreadsheet-based form	Process developed by national operators as part of CRTC "Network working group" <sup>218</sup>  Spreadsheet-based form	Capability being developed as part of centralised 'MAN monitoring database'  Planned API based

<sup>208</sup> [iconectiv Authenticate](#)

<sup>209</sup> [Neustar Policy Administrator](#)

<sup>210</sup> APNF

<sup>211</sup> [US Certificate Authorities](#)

<sup>212</sup> [Canada Certificate Authorities](#)

<sup>213</sup> APNF

<sup>214</sup> Enterprise Telecom Consultants 2018. [Number Authentication: What is the situation in the US? In France.](#)

<sup>215</sup> Breakable Call exceptions includes emergency calls, potentially any calls in the early stages of introduction, potentially any calls when a failure arises which requires the system to be overridden.

<sup>216</sup> Enterprise Telecom Consultants 2018. [Number Authentication: What is the situation in the US? In France.](#)

<sup>217</sup> [Industry Traceback Group \(ITG\)](#)

<sup>218</sup> [CRTC Network Working Group: Traceback Documentation](#)

	US	Canada	France
<b>Metrics / Reporting</b>	<p>Metrics Proposed by ATIS<sup>219</sup></p> <p>No common reporting platform</p>	<p>Metrics (periodic reporting) defined by Network working group.<sup>220</sup></p> <p>Reports emailed to CRTC, manually collated</p>	<p>Capability being developed as part of centralised 'MAN monitoring database'</p> <p>Planned API based</p>

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<sup>219</sup> [ATIS STIR/SHAKEN Metrics](#)

<sup>220</sup> [CRTC STIR/SHAKEN Guidelines](#)