

## Your response

Question	Your response
<p><b>Question 3.1: Do you agree with our analysis of the ways in which number spoofing is used, and the extent and types of harm associated with its use? If you have any further evidence which demonstrates the extent and types of harm involved, please provide this.</b></p>	<p><i>Is this response confidential? – No</i></p> <p>Yes.</p> <p>The ICO regulates unsolicited electronic marketing communications, including live and automated calls, SMS and emails under the Privacy and Electronic Communications (EC Directive) Regulations 2003. We regularly identify the use of ‘spoofed’ numbers associated with calls which cause damage or distress to often vulnerable subscribers. As such we identify the use of spoofed numbers as a facilitator of predatory calls which can result in financial loss and in some cases anxiety or distress. We have come across cases where the receipt of such calls has resulted in older individuals questioning whether they can remain living independently.</p>
<p><b>Question 4.1: Do you agree with our assessment that while Ofcom rules and industry measures are likely to help to reduce scam calls, more needs to be done to tackle number spoofing? Provide reasons for your answer and include any suggested measures that could have a material impact on reducing the incidence of scam calls involving number spoofing.</b></p>	<p><i>Is this response confidential? – No</i></p> <p>Yes.</p> <p>It is clear that much has been done, in recent years, to reduce the number of scam calls but a large number are still being made and the impact on victims is considerable.</p> <p>Any new initiatives which will reduce the number of such calls accessing the networks will obviously reduce the impact on victims on the whole.</p> <p>The measures outlined in this consultation document indicate that, if there is confidence in the numbering relating to calls, then the network will be able to block suspicious traffic from entering the network or from being passed from one network provider to another. This should reduce the volume of malicious calls being delivered to subscribers.</p>

<p><b>Question 5.1: Is the approach to CLI authentication we have outlined feasible and workable?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>We believe so.</p> <p>The approach as described would be workable to a degree due to the nature of the UK network, however, with around 70% of traffic being delivered over networks that would be able to support the implementation immediately and the majority of the rest to come online by 2025, we consider it to be feasible and workable in that context. A key consideration will be the co-operation and willingness of CSPs to implement the proposed rules and guidance.</p>
<p><b>Question 5.2: To what extent could adopting this approach to CLI authentication have a material impact on reducing scams and other unwanted calls? If you consider an alternative approach would be better, please outline this and your reasons why.</b></p>	<p><i>Is this response confidential? – No</i></p> <p>Any assessment at this stage cannot be certain that the proposed rules will have a material impact. We consider that an early evaluation of implementation would be beneficial in assessing whether the proposals are having their intended impact.</p>
<p><b>Question 5.3: Are there additional measures that could be adopted to further strengthen the suggested approach and/or minimise the identified exemptions?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>We consider there could be greater control over number allocation and entry into the network, although this must be balanced with accessibility and current flexibility for businesses and individuals. We have seen examples of small businesses being allocated hundreds of numbers. These numbers are then used in rotation to avoid detection by the network’s algorithms. If used by malicious callers these may also possibly avoid detection by any STIR/SHAKEN initiatives adopted by the networks as the numbers will be authenticated at the point they access the networks.</p>
<p><b>Question 6.1: Do you agree with the approach outlined for the monitoring and enforcement of the rules with regard to CLI authentication? Are there any alternative approaches that we should consider?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>We agree with Ofcom’s proposals.</p>

<b>Question 6.2: Do you agree that CLI authentication could make call tracing easier and yield benefits in terms of detecting scammers and nuisance callers?</b>	<p><i>Is this response confidential? – No</i></p> <p>We agree the information that will be available to authenticate the call should make tracing easier than at present.</p>
<b>Question 7.1: What are your views on the timescales for the potential implementation of CLI authentication, including the interdependencies with legacy network retirement?</b>	<p><i>Is this response confidential? – No</i></p> <p>As identified around 70% of calls at present or routed via networks that can support the implementation immediately with a target for full implementation by 2025.</p>
<b>Question 7.2: Do you agree with our assessment of the administrative steps required to implement CLI authentication and how these should be achieved?</b>	<p><i>Is this response confidential? – No</i></p> <p>The setting up of a CLI Authentication Administrator and supporting governance process should enable the implementation of the process.</p>
<b>Question 7.3: Should a common numbering database be implemented to support the CLI authentication approach? Please provide any comments on the steps needed to implement a common numbering database, including on the feasibility of the industry leading on (a) the specification; and (b) the implementation?</b>	<p><i>Is this response confidential? – No</i></p> <p>A common numbering database (CND) would be central to the proposal as it would allow easier authentication of CLI's. It has to be accepted that this will take a degree of effort and incur costs but access to a reliable CND would be essential in our view.</p>
<b>Question 8.1: Do you agree with the proposed framework for impact assessment and the potential categories of costs and benefits? Please identify any other factors that we should take into account in our assessment.</b>	<p><i>Is this response confidential? – No</i></p> <p>The benefits to subscribers both personal and business and the networks should outweigh any costs of setting up the system. Trust in telephony, and the protection of vulnerable individuals, must be a priority for regulators and the CSPs alike.</p>

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