Your response

Question	Your response
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.	*Is this response confidential? - N* No response to this question.
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.	*Is this response confidential? – N* Yes, we agree that more needs to be done, because end customers are still victim to fraudulent and scam activity.
Question 5.1: Is the approach to CLI authentication we have outlined feasible and workable?	*Is this response confidential? – N* We believe that the approach is technically feasible, though at huge financial and resource cost to the telecommunications sector. The workability of this is impacted by the number of projects that communications providers are already undertaking. The financial cost could be mitigated somewhat by contributions from the beneficiaries, but this doesn't address the skills shortage in the telecommunications industry.
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.	*Is this response confidential? – N* We do not believe that this approach will tackle the majority of scam call prevention, as a high proportion of the calls are originated internationally, and STIR/SHAKEN are not effective on these. It would be better to focus on Traceback and call blocking solutions first (including mobile roaming checks).

Question 5.3: Are there additional measures that could be adopted to further strengthen the suggested approach and/or minimise the identified exemptions?	*Is this response confidential? – N* The suggested approach assumes the existence of a Central Numbering Database, which isn't currently in place, and without which, Partial Attestation must be a part of the solution. There is also an assumption that every international call will be Gateway signed, whereas it would be hoped that there would be some interworking across some international borders. Blocking of +44 Presentation numbers at international gateways would strengthen (or provide an alternative to) the suggested approach, and we believe that it should be considered.
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?	*Is this response confidential? – N* No response to this question.
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?	*Is this response confidential? – N* CLI authentication could make call tracing easier than it is today, but in the international case it would only identify the UK gateway network. It would be better to focus on easier methods to give the same information (Call Traceback and/or mobile roaming checks).
Question 7.1: What are your views on the timescales for the potential implementation of CLI authentication, including the interdependencies with legacy network retirement?	*Is this response confidential? – N* We take our lead from the US/Canadian market, where the deployment timescales were approximately 2 years from regulator mandation (without any DB check as to the rights for an organisation to sign a CLI), plus budget cycle lead times, and resource contention from projects such as TSR compliance, legacy network switch-off, etc.
Question 7.2: Do you agree with our assessment of the administrative steps required to implement CLI authentication and how these should be achieved?	*Is this response confidential? – N* Yes, from a technical standards perspective.

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?	*Is this response confidential? – N* If a real-time check on whether an originator of a call has the right to use the associated CLI is required, then yes, a common numbering database is required.
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.	*Is this response confidential? – N* We believe that the aforementioned resource contention from projects such as TSR compliance, legacy network switch-off, mobile 3G switch-off, and the skills shortage in the telecommunications industry should be taken into account in the impact assessment.

Please complete this form in full and return to: **CLIauthentication@ofcom.org.uk**