

## Your response

Question	Your response
<p><b>Question 3.1:</b> 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.</p>	<p><i>Is this response confidential? – N (delete as appropriate)</i></p> <p><i>We broadly agree with your analysis of the harms of number spoofing.</i></p>
<p><b>Question 4.1:</b> 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.</p>	<p><i>Is this response confidential? – N (delete as appropriate)</i></p> <p><i>We agree that more could be done to tackle number spoofing. However, any new measures need to be carefully considered to ensure that they tackle the harm in an appropriate and proportionate manner. We would encourage Ofcom to make a quantitative assessment of the effectiveness of existing measures, in particular those introduced on 15 May 2023. This would provide a baseline against which estimating any marginal improvement achievable with CLI authentication.</i></p>
<p><b>Question 5.1:</b> Is the approach to CLI authentication we have outlined feasible and workable?</p>	<p><i>Is this response confidential? – N (delete as appropriate)</i></p> <p><i>Although technical standards have matured in recent years and there are a few cases of real-life implementation of the technology, we are still concerned that CLI authentication with STIR/SHAKEN represents a step change in complexity and cost compared to the measures implemented so far. We are also concerned that it comes with obvious limitations, such as not fully addressing national call scenarios unless coupled with a common numbering database and not addressing international call scenarios, except for simplifying the process of call tracing up to the international gateway.</i></p>
<p><b>Question 5.2:</b> 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</p>	<p><i>Is this response confidential? – N (delete as appropriate)</i></p>

<p>approach would be better, please outline this and your reasons why.</p>	<p><i>Considering the limitations mentioned above we believe that Ofcom should, in parallel with CLI authentication but possibly with higher priority, consider strengthening existing measures to tackle CLI spoofing. For example, Ofcom could consider the impact of:</i></p> <ul style="list-style-type: none"> <li>- <i>Expanding ND1447 to block UK Fixed Line Presentation Numbers at International Gateways.</i></li> <li>- <i>Expanding ND1447 to block UK Mobile numbers at International Gateways based on Roaming status lookup on MNO databases.</i></li> <li>- <i>Introducing an SLA-backed process for CPs to trace calls back to the originating UK network or International Gateway.</i></li> </ul>
<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? – Y / N (delete as appropriate)</i></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? – Y / N (delete as appropriate)</i></p>
<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>	<p><i>Is this response confidential? – N (delete as appropriate)</i></p> <p><i>We agree that CLI authentication would make call tracing easier, however the implementation of CLI authentication is complex and there are other ways to achieve call tracing that would rely on processes rather than new technology.</i></p>
<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>	<p><i>Is this response confidential? – N (delete as appropriate)</i></p> <p><i>We do not believe that end of 2025 is a realistically achievable target for CLI authentication considering the complexity of the undertaking and the current focus of investment and resources for industry on other major legal and regulatory requirements including the Telecoms Security Act and the Shared Rural Network, migration and</i></p>

	<i>retirement of legacy networks (e.g., 3G sunset) and rollout of future services (e.g., 5G Standalone).</i>
<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>	<i>Is this response confidential? – Y / N (delete as appropriate)</i>
<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? – N (delete as appropriate)</i></p> <p><i>We believe that introducing a common numbering database to support CLI authentication would significantly increase the complexity of an already complex delivery and should be phased-in after careful evaluation of the overall benefits.</i></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? – N (delete as appropriate)</i></p> <p><i>We believe that Ofcom should take into account the effectiveness of the existing and recently introduced measures as well as potential new measures that could be introduced in advance of CLI authentication.</i></p>

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