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Which?'s response to Ofcom's approach on Calling Line Identification (CLI) authentication - a potential approach to detecting and blocking spoofed numbers

Which? welcomes the opportunity to provide our views on Ofcom's proposed approach to CLI authentication and how it may work within the UK. In 2022, we supported Ofcom's proposals to improve the accuracy of Calling Line Identification data as part of their efforts to reduce the number of scam phone calls and the harm they caused consumers. We welcome further review by Ofcom concerning the implementation of CLI and other measures which may be sufficient in tackling number spoofing.

- Which? **supports** Ofcom's work to tackle number spoofing
- We **recommend** that Ofcom does not wait for Voice of Internet Protocol (VoIP) to address the problem of number spoofing and take immediate next steps towards
 - mandating the use of the Do Not Originate (DNO) list,
 - expanding the DNO list access beyond the banking sector
- We **emphasise** that the creation of a common numbering database should be shared to wider industry partners for the purpose of combating fraud
- We **believe** Ofcom needs to have the powers to **mandate** and **enforce** CLI authentication when it is rolled out in 2025

The harm caused by number spoofing

Scams are a widespread issue in the UK and number spoofing is a common tactic utilised by fraudsters. In 2021, 41 million people in the UK were targeted by suspicious calls and texts in the summer alone¹. The financial and emotional impact for victims is substantial. Our investigation², conducted in 2021, estimated that the impact of fraud victimisation amounted to £9.3 billion as a result of emotional and psychological harm. If left untackled, UK consumers will continue to be targeted by spoofed numbers and exposed to harm. Which? agrees with Ofcom's analysis on the ways in which spoofing is used, and the extent and types of harm that are associated with its use. The introduction of CLI authentication will have a positive effect on reducing spoofed numbers and it should allow for more effective call tracing to identify the source of unwanted calls.

¹ Ofcom. [New Ofcom Rules to Fight Fake Number Fraud](#). (2022).

² Which?. [Scams Impact on Victims' Wellbeing Amounts to £9.3bn](#). (2021).

We are keen to see the immediate actions that Ofcom will take to address the problem of number spoofing. Ofcom cannot rely or wait for the completion of the digital switchover to address the problem and should act now as consumers are losing millions of pounds from impersonation fraud³.

Immediate actions

Ofcom should ensure the existing measures to tackle the issue of spoofing are exhausted in advance of the introduction of CLI authentication. We suggest Ofcom and UK Finance find a route to mandate the effective DNO list for the banking sector. Our investigation revealed at least half a dozen banks have not made full use of the DNO list in their efforts at preventing spoofing, indicating that voluntary engagement continues to expose customers to further risk⁴. By requiring all UK banks to register all of their numbers on the DNO list, customers can benefit from additional protections from scammers.

Which? engagement across industry has revealed interest in additional data and we suggest Ofcom consider expanding its DNO list beyond the banking sector. The spoofing tactics aimed at banks are not a unique or isolated issue. Our research has revealed spoofing is harming consumers in the energy sector and we suspect this is a problem across multiple industries. Whilst it is difficult to put a figure on the number of energy related scams, references to one of the 'big six' suppliers (British Gas, EDF, Eon, Scottish Power, SSE and previously Npower) in crime reports has increased by 10% in the first quarter of 2022 in comparison to the previous year⁵. As fraudsters continue to adapt their strategies and tactics to maximise their reach, the extension of the DNO list could help protect other essential services and utilities.

A common numbering database

Which? welcomes Ofcom's consideration of a common numbering database in order to implement CLI authentication. Our understanding is that this would facilitate a central repository of all UK telephone numbers that could be used to validate legitimacy of all calls. Which? understands that this is a considerable task for UK providers and critical questions must be answered to build confidence to invest time and resources. In particular, certainty is needed on the time, cost and accountability of this approach. As part of a cost benefit analysis, Which? recommends that Ofcom consider the wider benefits of a central numbering database outside of CLI authentication. The database could be utilised as a broader mechanism for due diligence/account verification across industries to further help to tackle fraud.

A common numbering database could also illustrate the benefits of data sharing between telecommunication providers and act as an example for good practice in fraud prevention. Data sharing between telecommunication providers and other sectors would allow for a greater knowledge of scam trends and more effective efforts to reduce the level of harm. Data sharing could further allow telecommunication providers to conduct stronger due diligence checks on customers and help prevent fraudulent activity.

³ UK Finance. [New Figures Show £177.6m Was Lost to Impersonation Scams in 2022 as Take Five to Stop Fraud Issues Warning to The Public](#). (2023).

⁴ Which?. [Is it Really Your Bank Calling? How Some Banks are Failing Customers on Fraud Protection](#). (2022).

⁵ Which?. [7 Energy Scams to Watch Out For](#). (2022).

CLI Authentication Implementation

The transition to Voice over Internet Protocol (VoIP), presents a sensible opportunity for Ofcom to consider the implementation of CLI authentication as part of wider efforts to prevent spoofed numbers. We recognise that CLI authentication cannot be implemented until after the legacy networks in the UK have been decommissioned and replaced by IP networks by 2025, but we echo the importance of Ofcom ensuring that consumers are protected during this transition. As network providers are increasingly selling products on VoIP, consumers who currently use these services do so without sufficient protection. Ofcom should not wait until CLI implementation is technically feasible to reduce spoofing as it will leave consumers vulnerable to further harm during this transition. Ofcom should consider alternative measures during this timeframe to limit the amount of consumer harm.

Ofcom must also be conscious that the evolution of technology based solutions may be ineffective or circumnavigated by scammers, at the time of implementation in 2025. Scammers are constantly looking for ways to exploit new digital technologies to target consumers with fraud attacks at a greater speed, frequency and efficiency. It is crucial that Ofcom considers a standards based approach and continues to analyse the trends of fraudulent activity during this period.

Enforcement

Enforcement and compliance with CLI authentication will be critical in the overall effectiveness of combating spoofed numbers. Which? supports Shockey Consulting's warning that unless **'everyone does it, it will not not work'**⁶ and without industry wide engagement, CLI authentication will not be effective in combating scam calls. Which? recommends that CLI authentication is a mandatory requirement of all UK providers and Ofcom gets the necessary power to enforce it. In 2019 the US implemented a voluntary CLI authentication scheme but uptake by providers remained too low to prove effective. This resulted in the American Federal Communications Commission (FCC), having to take mandatory steps in 2020. Which? has no reason to believe a voluntary scheme would work differently in the UK and recommends steps toward mandatory implementation be made prior to 2025. Ofcom should continue to monitor the implementation and enforcement of CLI authentication in other countries.

Limitations

Which? recognises that CLI authentication will be effective in preventing spoof calls originating in the UK but there will subsequently be continued opportunities where scammers can trick consumers with spoof calls from outside of the UK. In order to ensure that CLI authentication is effective, Ofcom will need to continuously consider the global threat landscape to seek alternative routes to address these consumer harms.

About Which?

Which? is the UK's consumer champion, here to make life simpler, fairer and safer for everyone. Our research gets to the heart of consumer issues, our advice is impartial, and our rigorous product tests lead to expert recommendations. We're the independent consumer voice that works with politicians and lawmakers, investigates, holds businesses to

⁶ Shockey Consulting. [Issues in Calling Line Identification \(CLI\) Authentication in the United Kingdom Based on the Experiences in North America](#). (2021).

account and makes change happen. As an organisation we're not for profit and all for making consumers more powerful.

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