Your response

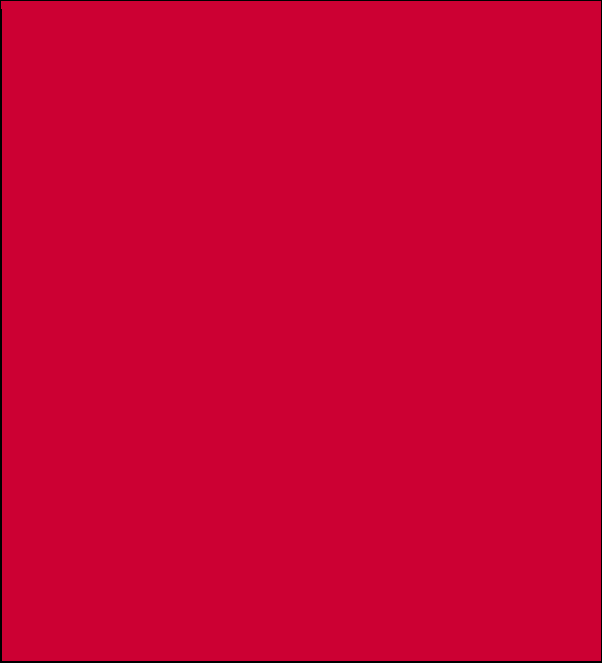| Question	Your response
Question 1 – Do you agree with our proposal to add the clarification paragraph, at paragraph 3.7 of this consultation, to the CLI guidelines? If you do not agree with this proposal, what are your reasons for this view?	TalkTalk welcomes the opportunity to comment on Ofcom's proposals to amend the CLI guid-ance setting out the type of numbers that can be used as Network Numbers. Ofcom is essentially proposing to clarify in the CLI guidance that a greater range of numbers, particularly non-geographic numbers, can be used as Network Numbers (with certain speci-fied restrictions). The accuracy and integrity of the Network Number is critical to the proper and effective handling of calls between net-works. We recognise the need for the CLI guid-ance to reflect market and technological devel-opments including the increasing presence of VoIP providers who may not own or run tradi-tional telecommunications networks. The relative ease with which SIP (VoIP) servers can now be deployed is lowering the barriers to the market for providing call services. This is naturally good for competition and consumers but combined with the proposed change to the CLI guidance, we can see an increased risk of confusion arising from the fact that non-geo-graphic numbers could be used as Network Numbers as well as Presentation Numbers. Cur-rently the risk is quite limited given that net-work providers typically use non-geographic numbers only as Presentation Numbers which makes it relatively easy to spot any mistakes when a network provider may have inadvert-ently populated the wrong number fields. With the proposed change and the expected in-crease in use of non-geographic numbers as Network Numbers, we would be concerned if it became more difficult to spot any potential er-rors made by providers as this might undermine the integrity of the Network Numbers across UK networks. Also, we would be concerned if providers felt it appropriate to use the same

non-geographic number as the Network Number on more than one originating network as this would be a clear breach of the CLI guidance and make it very difficult to identify the correct calling party (particularly in a emergency call scenario).

In conclusion, we are not convinced that the perceived benefits of the proposed change to the CLI guidance outweigh the potential risks as outlined above. We would therefore urge Ofcom to carry out a proper, detailed impact study before pressing ahead with these proposals.