



Vodafone Response to Ofcom
Consultation:
Consultation on the Calling Line
Identification guidelines
(Consultation on the types of numbers that can
be used as Network Numbers)



Response

Vodafone welcomes the opportunity to comment on Ofcom's proposed amendments to the CLI Guidelines.

Although the capabilities of communications providers to support different types of numbers as Network Number CLIs varies, it has always been our understanding that – so long as usage was compliant with the National Telephone Numbering Plan – there was no regulatory restriction that meant, for example, geographic numbers must be used. We were therefore somewhat surprised that Ofcom feels it necessary to advise on this matter in the CLI Guidelines. Nonetheless, if Ofcom has been receiving queries on the matter, this must reflect that there is a lack of clarity, so it is appropriate to provide advice in the CLI Guidelines.

We welcome the clarity provided on when usage of mobile numbers is appropriate – i.e. when a mobile service is being provided.

The text in the CLI Guidelines makes clear that originating communications providers are permitted to use non-geographic numbers, as opposed to being compelled to support such an approach. As mentioned, we understand that communications providers' capabilities differ, and there will be providers that retain the original approach of using geographic numbering for Network Number CLIs. This could have an impact where customers wish to port their numbers from providers that support non-geographic Network Number CLIs to those supporting only geographic. In this context, it may be prudent to recommend that communication providers issuing a non-geographic Network Number CLI advise customers of the potential restriction to portability – note that this should not represent a consumer detriment, because it is the Presentation Number that should be used for display purposes, and hence be of more interest in a porting context.

Vodafone UK
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