

14th April 2022

## **Response to “Improving the accuracy of Calling Line Identification (CLI) data”**

Magrathea welcome the opportunity to respond to this consultation which forms part of Ofcom’s work to tackle scam calls and texts. We are already an active participant in the NICC CLI Task Group and have engaged with Ofcom regularly to discuss this area of work.

We are particularly pleased to note that Ofcom is looking at CLI in the context of wider work around nuisance calls and scams and appreciates that there is no single approach to eliminate these types of calls. We also welcome the intent to carry out follow-up research and assess the impact of any changes to reflect that there is a constant shift in approach and technologies used by ‘bad actors’ as well as frequently evolving capabilities within the telecoms industry.

### **Response to consultation questions**

1. Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.

Magrathea agree that your proposed modification is a reasonable change given the aim of this consultation.

2. Do you agree with our proposal to bring this modification into force six months after the publication of our statement (which is planned for Autumn 2022)? If not, please provide reasons why a different date would be appropriate.

We would consider this timescale reasonable in so far as putting the industry on notice to make improvements, however, we urge Ofcom to recognise that our industry is currently undergoing a major period of transition whilst moving to all-IP and is also amidst a deluge of regulatory changes that require significant resource. Therefore, we would ask for either an extended implementation window, or, that any associated guidance make it clear that there will be a sufficiently proportionate approach to monitoring and enforcement during this transition period.

3. Do you agree with the proposed changes to the CLI guidance? Please provide reasons for your response. Please set out your comments on each of the proposed changes separately.

We generally agree with the proposed changes to the CLI guidance, assuming an update is considered proportionate at this time (please see Conclusion & Question below). However, we would like to comment on a few specific points:

#### Compliance with standards

Throughout the last few months, as more networks migrate to IP services, it has become apparent that some networks are mishandling CLI data by swapping Network Number and Presentation Number fields. Obviously, we are tackling this on a case by case/bilateral basis, but the process is lengthy and difficult, particularly where there are multiple carriers in the call path.

It would seem reasonable for Ofcom to monitor compliance with CLI standards amongst the major carriers at least, or to introduce a mediation method to help interoperability issues such as this progress more smoothly for the good of the entire telecommunications industry. Failings in this area have a direct negative impact on end users and have the potential to cause far wider significant harm than many of the other scenarios this guidance serves to address.

**DNO List:** In making the use of the DNO list mandatory, Ofcom must commit to creating a simple and efficient way for networks to collect that data that will remain in a consistent and standard format.

**Calls from abroad:** At 4.17 in the guidance, you clarify that calls should not be blocked if the CLI is a mobile user roaming in the UK and that there is a list that can be obtained from Ofcom. It is unclear from the guidance if the use of this list is mandatory. We would expect the use and maintenance of such a list to be a significant overhead to us and, similarly to the DNO list, would want assurances that the data can be collected in a standard, simple way.

4. Do you have any comments on the use of 084 and 087 non-geographic numbers as Presentation Numbers and/or on the impact if the use of 084 and 087 numbers as Presentation Numbers was prohibited in the CLI guidance? Are you aware of any examples of the use of 084 or 087 numbers as Presentation Numbers?

We are not aware of any problems caused by using these number types as presentation CLI and are not aware of any justification to prohibit their use. All the while these number types are in use by the general public, we feel it reasonable to allow their use as presentation numbers, particularly when you consider many small businesses are unlikely to have the capability or understanding to manage alternatives for the purposes of call processing.

#### **Additional comment on existing guidance**

The current guidance, and remaining in the proposed updated guidance, states at A2.3 that any dispute resolution process should be “managed in a timely fashion..”. It is apparent that this can be open to interpretation and there is the potential to cause serious harm if blocks are applied incorrectly and network intervention isn’t rapid. We would ideally like to see some tighter guidance around this in the updated document.

**Question: Impact of International Surcharging**

One of the significant changes resulting from the Wholesale Voice Market Review in 2021, was the introduction of surcharging for internationally originated calls. One of the resulting outcomes of this change, by some networks, is a large surcharge being applied to any call (originated in the UK or elsewhere) with an apparently invalid or missing CLI.

Magrathea are keen to understand what impact this has had on the volume of calls passing through the network with non-compliant CLI and if there has been an impact on complaints relating to scam calls and CLI spoofing.

We suspect that the resulting efforts to 'tidy up' CLI use across the board will have brought about a significant reduction in problem calls, which in turn would question the proportionality of the changes proposed in this consultation and the requirement to extend the regulations from beyond those already in place.

Whilst Magrathea remain supportive of improvements and monitoring in this area, we do feel it important that any additional demands placed on networks remain proportionate and effective when compared to the problems they are designed to resolve.

Yours faithfully,

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