

Your response

| Question | Your response |
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| <p>Question 3.1: Do you have further views about the implementation of STIR?</p> | <p>Cifas welcome the introduction of the Secure Telephone Identity Revisited (STIR) Standard.</p> <p>The current telephone system is often abused by fraudsters and, particularly with older people, will be the first point of contact in frauds and scams.</p> <p>It is currently, particularly with overseas originated calls, impossible to verify the legitimacy of such contact.</p> <p>STIR will provide consumers with the reassurance that the calls they receive are from a legitimate source and has the potential to reduce scam calls.</p> <p>It will be an essential tool when the system moves to IP protocol and common database in 2022.</p> |
| <p>Question 3.2: Are there any other approaches we should consider for addressing CLI authentication?</p> | <p>Call Line Identity will need to extend to overseas calls and consumers will need to have the ability to block or reliably filter out such calls to help protect them from frauds and scams. The ability to tailor calls including the ability to block or filter calls should be an integral part of CLI and not an aftermarket accessory.</p> |
| <p>Question 3.3: Do you agree a common database would be required to support the implementation of STIR?</p> | <p>Agreed if STIR is to prove an effective, and most importantly, a reliable tool.</p> |
| <p>Question 3.4: What are your views on using blockchain technology as the basis for a common numbering database to support CLI authentication? What other solutions do you think should be considered and why?</p> | <p>I think that we need to see and assess the results from the pilot before committing to the adoption of blockchain technology.</p> |
| <p>Question 3.5: What are your views on timeframes?</p> | <p>It is assumed that timeframes are driven by process times and the need to move from one</p> |

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| | <p>technical solution to the next. We have some concerns around the realism of timescales given the challenge for the larger network operators to move consumers to IP. Any reduction in time for the introduction of STIR and CLI would be welcome.</p> |
| <p>Question 4.1: What are your views on the current implementation of number portability in the fixed and mobile sectors?</p> | <p>The current number porting system is a clunky and time consuming system but works reasonably well.</p> <p>From a fraud perspective there is an issue around Sim swap which is often part of the process of moving from one provider to the next. In this regard, there needs to be tighter checks on the identity of those requesting porting to ensure that the person is not perpetrating a fraud and seeking to take over a legitimate customer's phone.</p> |
| <p>Question 4.2: What are your views on sharing the functionality of a common numbering database for CLI authentication to also support improvements in UK porting processes?</p> | <p>Providing safeguards are in place then the approach may reduce fraud and improve consumer confidence given the inbuilt verification of the CLI database.</p> |
| <p>Question 4.3: We are currently supporting a blockchain pilot. Do you have any views on using this technology for port transactions and a routing database? Are there other alternatives that should be considered?</p> | <p>The outcome of the pilot needs to be properly assessed before a move to adopt wider is considered.</p> |
| <p>Question 4.4: What are your views on implementation timeframes and the importance of a common database solution being available to support the migration of telephony services to IP?</p> | |
| <p>Question 5.1: What are your views on the potential for a common database solution to also provide shared functionality to support number management?</p> | |
| <p>Question 5.2: What do you see as the benefits or disbenefits of changes to number management post PSTN retirement?</p> | <p>Greater flexibility around number allocation post PSTN is an advantage and seems logical to move forward, as suggested.</p> |
| <p>Question 6.1: Do you agree, in principle, with the need to develop and adopt a common numbering database? If not, why not?</p> | <p>A common numbering database is entirely logical and will form a firm foundation for other products such as porting of calls and CLI. We also believe that it would be a positive development to bring all providers under the same umbrella to help unify and develop a more effective suite of counter-fraud protections.</p> |

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| Question 6.2: If you do not agree with the need to develop and adopt a common numbering database, do you have any suggestions on how the issues we have set out in this consultation could be addressed? | The legal and regulatory issues highlighted by the Competition Appeal Tribunal will be negated by the suggested approach. |
| Question 6.3: Do you agree that in the first instance industry should lead the implementation of a common numbering database, with Ofcom providing support to convene and coordinate key activities? If not, what are your views on how implementation should be taken forward? | Ofcom should lead the change given the nature and impact on the infrastructure but should do so in partnership with industry. |