
Improving the accuracy of Calling Line Identification (CLI) data

Consultation on changes to our General Conditions and supporting guidance on the provision of CLI facilities

[Improving the accuracy of Calling Line Identification \(CLI\) data](#) – Welsh overview

CONSULTATION:

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1. Overview

Protecting consumers from harm is a priority for Ofcom and we are concerned about the growing problem of scams facilitated by calls and texts.¹ A common tactic used by scammers is to ‘spoof’ telephone numbers to make them appear to be from a trusted person or organisation, such as a bank. Where scam calls appear trustworthy, it means victims are more likely to share personal information or make a payment, which can lead to significant financial and emotional harm.

Our rules require providers to make information about the caller available to help the recipient of a call understand who is calling them and if they wish to answer the call. However, changes in technology have made it easier for scammers to manipulate this data to spoof numbers. This includes scammers who are based abroad using spoofed numbers to make it look like they are calling from the UK.

In this document we set out proposals to strengthen our rules and guidance for providers to identify and block calls with ‘spoofed’ numbers. This should help to prevent scam calls from reaching consumers and ultimately to reduce the risk of people being scammed. The consultation also aims to make it clearer to providers how we expect them to use data associated with calls.

What we are proposing

The data that is attached to a call is called Calling Line Identification (CLI) data. It consists of a number that identifies the caller and a privacy marking, which indicates whether the number can be shared with the person receiving the call. Ensuring that the CLI data includes a valid, dialable number, and that the caller has authority to use the number, is important so that people have accurate information about who is making a call when they receive it. This can help them decide whether or not to answer the call.

We propose to modify one of our rules (General Condition (GC) C6) to require providers, where technically feasible, to identify and block calls with CLI data which is invalid, non-dialable, or which does not uniquely identify the caller.

We propose to make a number of changes to our guidance for providers on what we expect them to do to comply with the rules in GC C6.² This includes

- clarifying that the format of a CLI should be a 10- or 11-digit number;
- making use of information that identifies numbers which should not be used as CLI, such as Ofcom’s numbering allocation information and the Do Not Originate (DNO) list;³
- identifying calls originating abroad that do not have valid CLI and blocking them; and

¹ See Ofcom, March 2021. [Ofcom’s plan of work 2021/22](#), page 16.

² [Annex 2: \[Draft\] Guidance on the provision of Calling Line Identification facilities and other related services](#)

³ Ofcom compiles a list of certain inbound-only UK telephone numbers and shares it with telecoms providers, their intermediaries and interested parties like call blocking or filtering services, so that outgoing calls from those numbers can be blocked. We refer to this as the ‘Do Not Originate’ (DNO) list. Outbound calls from numbers on the DNO list will be blocked at the network level by providers (where technically feasible) and at the presentation level by call blocking and filtering services. Further detail on the DNO list is included on our website: [‘Do Not Originate’ \(DNO\) list](#)

- identifying and blocking calls from abroad spoofing UK CLI.

Taken together, our proposed changes to GC C6 and associated proposed changes to the guidance should help providers to identify and block calls that have inaccurate CLI data. Blocking calls that do not comply with our rules for CLI data will mean that calls with the most obviously spoofed CLI data will not reach the intended recipient. This should help reduce the number of scam calls reaching consumers and ultimately the number of people being scammed in this way.

We also seeking input from stakeholders on:

- proposed changes to the CLI guidance aimed at clarifying our expectation on the types of numbers that should be used as CLI, in response to feedback from providers; and
- the use of 084 and 087 numbers as Presentation Numbers – these are numbers nominated or provided by the caller that can identify the caller or be used to make a return or subsequent call.

If implemented, the measures in this consultation should help to bring some immediate benefits to consumers by helping to block more scam calls. Over the longer term, having processes that detect and block spoofed numbers more comprehensively will be important to help tackle scam calls. We are exploring the introduction of technical standards that make it possible for the network originating the call to confirm the caller's authenticity before passing it to the network of the person receiving the call, referred to as 'CLI authentication.' We plan to issue a call for inputs in Q4 2022 seeking views on the role of CLI authentication and what would be required to implement the technology across industry.

Next steps

- 1.1 We invite responses to this consultation by 20 April 2022. Subject to considering the views and evidence submitted in responses, we aim to publish a decision on our proposals in Autumn 2022.
- 1.2 This consultation forms part of Ofcom's wider work to tackle scam calls and texts. Alongside our proposals to strengthen our rules and guidance for providers to detect and block spoofed numbers, we are consulting on a good practice guide to help prevent scammers accessing valid phone numbers.⁴ We have also added information to our website to explain the purpose of our DNO list and how to get in touch if you think you have numbers that should be added to the list.⁵ We will be considering whether the DNO list can be expanded to include numbers from a wider group of organisations.
- 1.3 We will carry out follow-up research into the incidence of call and text scams to help us monitor the impact of work that we and others are doing, including where to focus our efforts as scammers evolve their tactics. The research will also inform our continued work to raise awareness of scams and the steps people can take to protect themselves. We will also continue to collaborate with other organisations working to reduce scams as part of a coordinated approach.

⁴ Ofcom, February 2022. [Good practice guide to help prevent misuse of sub-allocated and assigned numbers.](#)

⁵ Further detail on the DNO list is included on our website: ['Do Not Originate' \(DNO\) list](#)

2. Background and introduction

Background

Strengthening our rules and guidance on CLI data is part of Ofcom's work to tackle scam calls and texts

2.1 We are committed to working with partners to reduce the harm from scam calls and texts. The key elements of our response are set out below.

- We aim to **disrupt scams** by making it harder for scammers to use communications services to reach consumers. We propose to strengthen our rules and guidance, while at the same time supporting providers to develop their own technical solutions to detect and prevent scam traffic.
- Scams are increasingly complex, often involving different companies and sectors. So, a coordinated approach is vital to ensure more scam attempts are blocked or disrupted. We will **collaborate and share information** more widely, including with Government, regulators, law enforcement and consumer groups.
- Given the pace at which scammers change their tactics, we understand that it will not be possible to stop all scams reaching consumers. We are working to **help consumers avoid scams** by raising awareness so consumers can more easily spot and report them.

The importance of avoiding misuse of CLI data

2.2 CLI data consists of a number that identifies the caller and a privacy marking, which indicates whether the number can be shared with the recipient of the call. It can give the recipient of a call information about the identity of the party making that call, which can help them decide if they wish to answer or return it. CLI data can also be used for other purposes, such as call tracing to identify the source of unwanted calls, or as a reference to help identify the location of a caller in emergency situations. To be effective, the CLI data must accurately identify the caller, meaning that the number is one which the caller has the authority to use, either because it is a number which they have been allocated or they have been given permission by a third party who has been allocated that number.

2.3 The ability to make calls over the internet ('IP calling') has made it cheaper to generate calls and has resulted in an increase in the volume of unsolicited calls. Using IP calling, providers (and some callers) can more easily manage and manipulate the CLI data provided with a call. Consequently, the CLI data that is provided may not always be accurate and it can be intentionally misused for a variety of malicious reasons, most obviously by 'spoofing' the identity of a caller to mislead the recipient of the call.

2.4 Spoofing involves callers hiding their identity by causing a false or invalid phone number to be displayed when making calls. A spoofed number on a call display might be a random series of digits or can mimic the number of a real company or person who has nothing to

do with the actual caller. Fraudsters based abroad often spoof UK CLIs to make scam calls to UK consumers, which might encourage the recipient to believe that a call is from a legitimate source and make them more likely to answer it. The use of spoofed numbers has made it harder to detect and block such calls and to trace perpetrators.

- 2.5 The misuse of CLI data can lead to significant harm for consumers, for example where scammers mislead the recipient of the call about their identity in order to encourage them to give away sensitive information or money. We have found that the problem of scam calls (and texts) is now widespread, with attempted scams affecting the vast majority of consumers in the UK (discussed further in Section 3 of our scams policy positioning statement).⁶ As we set out in our scams policy statement, fraud now accounts for 40% of all reported crime incidents. In a survey carried out in September 2021, 82% of UK adults reported being exposed to some form of suspicious call or text in the three months prior to the survey.⁷
- 2.6 The misuse or spoofing of CLI data can also have wider effects, such as reducing consumer trust in voice calls. Any loss of trust in communications services may mean that legitimate communications from businesses are ignored or not received. We discuss the harms that may be caused by call and text scams in Section 3 of our scams policy positioning statement.⁸
- 2.7 We set out the rules for the use of CLI data in phone calls through General Condition C6, supported by the CLI guidance (which sets out what we expect providers to do to comply with GC C6).⁹

Work Ofcom has undertaken to improve CLI data to date

Introduction of GC C6 and consultation on CLI guidance

- 2.8 As part of our 2017 review of the General Conditions (GCs), we introduced GC C6. This included requirements for providers to:
- a) provide CLI facilities by default;
 - b) ensure that any CLI data provided with, or associated with a call, includes a valid, dialable telephone number which uniquely identifies the caller; and
 - c) take all reasonable steps to identify and block calls in relation to which invalid or non-dialable CLI data is provided.¹⁰

⁶ Ofcom, February 2022. [Tackling scam calls and texts: Ofcom's role and approach](#).

⁷ Ofcom, October 2021. [45 million people targeted by scam calls and texts this summer](#). We also published [data tables](#) from the research on our website.

⁸ Ofcom, February 2022. [Tackling scam calls and texts: Ofcom's role and approach](#).

⁹ For the avoidance of doubt, GC C6 and our CLI guidance do not apply to text messages and the data that accompanies them (e.g. Sender ID).

¹⁰ Ofcom, September 2017. [Review of the General Conditions of Entitlement: Statement and Consultation](#), paragraphs 13.90-91.

- 2.9 At the same time, we consulted on revised guidance for the provision of CLI data.¹¹ We subsequently published guidance ('CLI guidance') for providers on our GC C6 requirements, clarifying the meaning of valid and dialable CLI for originating, transit and terminating providers in terms of the technical capabilities then available, and setting out that:¹²
- a) Originating providers are responsible for ensuring that accurate CLI data is provided with a call. Transit and terminating providers are expected to check that the number provided with a call is from a valid number range.
 - b) For calls that originate on a network outside the scope of our requirements (e.g. calls to or from providers not in the UK, or calls that may use the public network in transit), the provider at the first point of ingress is responsible for ensuring that the call is populated with valid CLI data, replacing the information with a number that has been allocated to them for this purpose where the original number is not valid or is missing.
- 2.10 The revised guidance clarified the options available to providers to prevent calls with invalid or non-dialable CLI from being connected to the end user. To support the guidance, we made numbers in the 08979 range available for providers to use as inserted Network Numbers for CLI purposes, where no number was present or they suspected that the incoming CLI was not reliable.¹³

Amendments to ensure that emergency calls are not blocked

- 2.11 In 2018, we made an amendment to GC C6 in order to ensure that calls to the emergency services are never blocked, regardless of the validity of the CLI data provided with the call. We made some amendments to the CLI guidance to reflect the change.¹⁴

Further consultation on CLI guidance

- 2.12 In November 2019, we consulted on adding a new paragraph to the CLI guidance on GC C6 to clarify that any type of Public Communications Network Number may be used as the Network Number provided that:
- a) the use of that number is not in breach of any restriction or requirement set out in the Numbering Plan;
 - b) it is not a number that connects to a premium rate service (e.g. prefixed 09) or to a revenue sharing number that generates an excessive or unexpected call charge; and

¹¹ Ofcom, September 2017. [Guidelines for CLI Facilities: a consultation on revising the guidance for the provision of Calling Line Identification information.](#)

¹² Ofcom, April 2018. [A statement on revising the guidance on the provision of Calling Line Identification facilities.](#)

¹³ By inserting an 11-digit 08979 Network Number in place of an absent or unreliable Network Number, the provider makes clear to other providers that the Network Number has been inserted. The UK provider that inserted the Network Number can be identified by the two digits that follow 08979. Initial call tracing enquiries can then be directed to that provider, thus accelerating the call tracing process.

¹⁴ Ofcom, July 2018. [Statement on changes to the General Conditions on Entitlement: Changes to General Condition C6, other minor drafting changes and changes to the guidance on the Calling Line Identification facilities.](#)

- c) the relevant provider complies with its obligations under GC A3 in relation to the provision of accurate caller location information to the emergency services for calls to “112” and “999.”¹⁵

2.13 In response, stakeholders raised a number of additional queries which required further consideration. At the time, we deferred the final statement on the changes until we could appropriately consider and consult on the issues that were raised. Those issues have now been included in this consultation.

This consultation

2.14 This consultation continues our work to improve the accuracy of CLI data. Our objectives are to:

- reduce the number of scam calls consumers receive and as a result to contribute to a reduction in the number of people being scammed; and
- improve confidence in CLI data and trust in telephone services.

2.15 In this document, we set out for consultation:

- a) Our proposal to modify GC C6.6 to require providers, where technically feasible, to identify and block calls with CLI data which is invalid or non-dialable, or which does not uniquely identify the caller.
- b) Our proposal to make a number of changes to our CLI guidance:
- i) Clarifying what we expect providers to do to identify and block calls that do not have valid, dialable CLI data which uniquely identifies the caller. This includes:
 - clarifying that the format of a CLI should be a 10- or 11-digit number;
 - making use of information that identifies numbers which should not be used as CLI, such as Ofcom’s numbering allocation information and the Do Not Originate list;
 - identifying calls originating abroad that do not have valid CLI and blocking them; and
 - identifying and blocking calls from abroad spoofing UK CLI.
 - ii) Other changes clarifying our expectation on the types of numbers that should be used as CLI in response to feedback from providers:
 - to specify that the Presentation Number must not be an 09 non-geographic number (but other revenue sharing numbers may be used);
 - to require that for calls from a fixed access ingress, the Network Number should be a geographic number; and
 - to clarify that CLI data may include optional display name information but that this information should not be displayed to the call recipient unless the provider is confident it is accurate.

¹⁵ Ofcom, November 2019. [Consultation on the Calling Line Identification guidelines: A consultation on the types of numbers that can be used as Network numbers.](#)

- c) We also seek stakeholders' views on whether we should prohibit the use of 084 and 087 numbers as Presentation Numbers.
- 2.16 Taken together, our proposed changes to GC C6.6 and the associated proposed changes to the guidance should help providers to identify and block calls that have inaccurate CLI data. Blocking calls that do not comply with our rules for CLI data will mean that calls with the most obviously spoofed CLI data will not reach the intended recipient. This should help reduce the number of scam calls reaching customers and ultimately the number of people being scammed in this way.
- 2.17 By requiring providers to block calls with inaccurate CLI data, our proposed changes will also improve the accuracy of CLI data provided to call recipients, helping them decide which calls they wish to answer. It will make it easier to trace problematic calls that continue to be made, as these calls are more likely to be using a CLI that will uniquely identify the caller. Improving the accuracy of CLI data will also improve confidence in CLI data and trust in telephone services. This will benefit consumers, legitimate businesses and other genuine users of telephone services, as their calls are more likely to be answered.
- 2.18 We invite stakeholder comments on the proposals set out in this document. The deadline for responding is 20 April 2022.

Legal framework

- 2.19 When formulating the proposals in this consultation we have had regard to our duties under the Communications Act 2003 (the Act).

Our general duties

- 2.20 Section 3(1) of the Act states that it shall be our principal duty, in carrying out our functions:
- a) to further the interests of citizens in relation to communication matters; and
 - b) to further the interests of consumers in relevant markets, where appropriate by promoting competition.¹⁶
- 2.21 In performing our duties, we are required to have regard to the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed, as well as any other principles appearing to us to represent best regulatory practice (section 3(3) of the Act).
- 2.22 Section 3(4) of the Act provides that we must have regard, in performing our duties, to a number of matters, as they appear to us to be relevant in the circumstances, including the desirability of ensuring the security and availability of public electronic communications networks and services; the needs of persons with disabilities, of the elderly and of those on low incomes; the desirability of preventing crime and disorder; the opinions of consumers

¹⁶ 'Consumer' is defined in section 405(5) of the Act and includes people acting in their personal capacity or for the purposes of, or in connection with, a business.

in relevant markets and of members of the public generally; and the extent to which, in the circumstances of the case, the furthering or securing of the matters mentioned in section 3(1) is reasonably practicable.

- 2.23 In addition, section 3(5) of the Act requires that, when performing our duty to further the interests of consumers, we must have regard, in particular, to the interests of those consumers in respect of choice, price, quality of service and value for money.
- 2.24 As required by section 2B(2)(a) of the Act, we have also had regard to the UK Government's Statement of Strategic Priorities for telecommunications, management of radio spectrum and postal services (SSP).¹⁷ In particular, we have had regard to furthering the interests of telecoms consumers, which is a priority area covered by the SSP.

Powers and duties in relation to general conditions

- 2.25 Section 45 of the Act says that we may set general conditions which contain provisions authorised or required by one or more of sections 51, 52, 57, 58 or 64. Under section 51(1)(a), we may set general conditions making such provisions as we consider appropriate for the purpose of protecting the interests of end-users of public electronic communications services.
- 2.26 Section 51(2) sets out a non-exhaustive list of the specific types of general condition that we may set in pursuance of this purpose. This includes:
- a) section 51(2)(a), which gives Ofcom the power to set conditions relating to the supply, provision or making available of goods, services or facilities in association with the provision of public electronic communications services;
 - b) section 51(2)(b), which gives Ofcom the power to set conditions to provide protection for end-users that is the same as, or similar to, any protection that was required by Title III of Part III of the EECC immediately before the end of the transition period; and
 - c) section 51(2)(f), which gives Ofcom the power to set conditions to require a communications provider, in specified circumstances, to block access to telephone numbers or services in order to prevent fraud or misuse, and enable them to withhold fees payable to another communications provider in those circumstances.
- 2.27 Section 47(2) of the Act states that a condition can be set or modified where it is objectively justifiable in relation to the networks, services, facilities, apparatus or directories to which it relates; not such as to discriminate unduly against particular persons or against a particular description of persons; proportionate to what the condition or modification is intended to achieve; and transparent in relation to what it is intended to achieve.¹⁸

¹⁷ Department for Digital, Culture, Media and Sport (DCMS), October 2019. [Statement of Strategic Priorities](#).

¹⁸ Section 47(3) states that the setting of a general condition is not subject to the test of being objectively justifiable, although we are likely to consider this in any event when assessing whether the condition is proportionate.

2.28 Section 4(2) of the Act requires Ofcom to act in accordance with six requirements when carrying out certain functions, including those in relation to setting or modifying GCs. These requirements include to promote the interests of all members of the public in the United Kingdom.

Impact assessment

2.29 The analysis in this document constitutes an impact assessment in respect of the proposals that we are setting out for consultation.

Equality impact assessment

2.30 Section 149 of the Equality Act 2010 (the 2010 Act) imposes a duty on Ofcom, when carrying out its functions, to have due regard to the need to eliminate discrimination, harassment, victimisation and other prohibited conduct related to the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex and sexual orientation. The 2010 Act also requires Ofcom to have due regard to the need to advance equality of opportunity and foster good relations between persons who share specified protected characteristics and persons who do not.

2.31 Section 75 of the Northern Ireland Act 1998 (the 1998 Act) also imposes a duty on Ofcom, when carrying out its functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations across a range of categories outlined in the 1998 Act. Ofcom's Revised Northern Ireland Equality Scheme explains how we comply with our statutory duties under the 1998 Act.¹⁹

2.32 To help us comply with our duties under the 2010 Act and the 1998 Act, we assess the impact of our proposals on persons sharing protected characteristics and in particular whether they may discriminate against such persons or impact on equality of opportunity or good relations.

2.33 We do not consider that our proposals have equality implications under the 2010 Act or the 1998 Act.

Structure of this document

2.34 The rest of this document is set out as follows:

- Section 3 sets out our proposed change to GC C6
- Section 4 sets out our proposed changes to the CLI guidance

2.35 The Annexes are set out as follows:

¹⁹ Ofcom, January 2014 (updated December 2019). [Revised Northern Ireland Equality Scheme for Ofcom.](#)

- A1: Notification of proposed modification to the General Conditions under sections 48(1) and 48A(3) of the Act
- A2: The CLI guidance with proposed changes
- A3: Responding to this consultation
- A4: Ofcom's consultation principles
- A5: Consultation coversheet
- A6: Consultation questions
- A7: Glossary and abbreviations

3. Proposed amendment to General Condition C6

Introduction

3.1 CLI facilities provide information to the called party about who is calling them and help them decide if they wish to answer the call. However, CLI data can be spoofed, to intentionally mislead the recipient about the identity of the caller. We are proposing an amendment to GC C6 to strengthen our existing requirements for providers to validate the telephone numbers of calls that originate on or enter their networks. Our objective is to ensure that all providers involved in the transmission of a call play a part in identifying calls that do not have valid, dialable CLI data which uniquely identifies the caller, and in preventing these calls from being connected to the called party.

Requirements to identify calls with invalid or non-dialable CLI

3.2 The requirements for providers regarding CLI facilities are set out in GC C6.²⁰ GC C6 applies to all providers of Number-based Interpersonal Communications Services and Public Electronic Communications Networks over which Number-based Interpersonal Communications Services are provided.²¹

3.3 GC C6 requires that, when providing CLI facilities, providers must ensure, so far as technically feasible, that any CLI data provided with and/or associated with a call includes a valid, dialable telephone number which uniquely identifies the caller. The requirement is set out in GC C6.4 which states:

When providing **Calling Line Identification Facilities, Regulated Providers** must:

- a) ensure, so far as technically feasible, that any **CLI Data** provided with and/or associated with a call includes a valid, dialable **Telephone Number** which uniquely identifies the caller; and
- b) respect the privacy choices of **End-Users**.

3.4 GC C6 also requires that, where technically feasible, providers must take all reasonable steps to identify calls in relation to which invalid or non-dialable CLI data is provided, and to prevent those calls from being connected to the called party. This requirement is set out in GC C6.6 which states:

²⁰ See Ofcom's [General Conditions of Entitlement](#).

²¹ We explained in our statement on [Implementation of the new European Electronic Communications Code](#) our decision to replace the term 'Publicly Available Telephone Service' with the new term 'Number-Based Interpersonal Communications Service' in GC C6 (see Section 3 of the statement). The term captures, for example, fixed and mobile telephone services, as well as VOIP outbound call services.

Where technically feasible **Regulated Providers** must:

- a) take all reasonable steps to identify calls, other than calls to **Emergency Organisations**, in relation to which invalid or non-dialable **CLI Data** is provided; and
- b) prevent those calls from being connected to the called party, where such calls are identified.

3.5 The meaning of ‘valid’, ‘dialable’ and ‘uniquely identifies’ is set out in the CLI guidance.

- A **valid number** is one which complies with the International public telecommunication numbering plan (Recommendation ITU-T E.164).²² Where a UK number is used, it must be a number that is designated as a ‘Telephone Number available for Allocation’ in the National Telephone Numbering Plan²³ and be shown as allocated in the National Numbering Scheme.²⁴
- A **dialable number** must be one that is in service and can be used to make a return or subsequent call.
- A number **uniquely identifies the caller** (which can be an individual or an organisation) where it is one which the user has authority to use, either because it is a number which has been allocated to the user or because the user has been given permission (either directly or indirectly) to use the number by a third party who has been allocated that number.

3.6 Calls with CLI data that appears valid and dialable, but which is spoofed, will not be caught by GC C6.6 and may be connected to the called party. These calls could cause considerable harm to consumers, particularly where a scammer attempts to spoof the identity of a known organisation, such as a bank, using a number associated with that organisation.

Proposal to require providers to identify and block calls with CLI which do not uniquely identify the caller

3.7 We propose to modify GC C6.6 to require providers, where technically feasible, to identify and block calls with CLI data which does not uniquely identify the caller. This would bring consistency between the obligations in GC C6.4 and GC C6.6. The proposed change is highlighted below:

²² International Telecommunications Union. [E.164: the international telecommunication numbering plan](#).

²³ Ofcom, [National Telephone Numbering Plan](#).

²⁴ The National Numbering Scheme is the day-to-day record of the telephone numbers allocated by Ofcom in accordance with the Numbering Plan. It is [published on our website](#).

Where technically feasible **Regulated Providers must:**

- a) take all reasonable steps to identify calls, other than calls to **Emergency Organisations**, in relation to which ~~invalid or non-dialable~~ **the CLI Data provided is invalid, non-dialable or does not uniquely identify the caller is provided**; and
- b) prevent those calls from being connected to the called party, where such calls are identified.

- 3.8 Spoofed numbers, even when they appear valid and dialable, will not uniquely identify the caller because the person spoofing the call does not have authority to use the number.
- 3.9 It is not currently technically feasible to identify all spoofed numbers, particularly where the caller spoofs a valid number. However, we consider that technically feasible steps can reasonably be taken by providers to check whether the CLI associated with a call is being used by the individual or organisation that has the authority to use the number. Strengthening the existing requirements in this way should therefore increase the identification and blocking of calls with spoofed numbers.
- 3.10 We are also proposing some changes to the CLI guidance, which sets out what is expected of providers to meet GC C6, to reflect this change.²⁵ The guidance will set out the steps that we consider should be taken by providers to identify calls which do not have valid, dialable CLI data which uniquely identifies the caller. These proposed changes are explained below in paragraphs 4.2-4.34.

Impact of the proposals and how they meet Ofcom's objectives

- 3.11 The proposed modification to GC C6.6 and the related changes to the CLI guidance (discussed in more detail in paragraphs 4.2 to 4.34) strengthen our existing requirements for providers to identify and block calls with CLI data which does not uniquely identify the caller. This should make it more difficult for scammers to successfully spoof CLI data to intentionally mislead the recipient about the identity of the caller. As such, we consider that the proposals should contribute to our first policy objective of reducing the harm from scam calls.
- 3.12 We have not attempted to quantify the benefits of these proposed changes. This is because they are part of a wider package of measures – by Ofcom, other regulators, government and industry – designed to disrupt scams in general and reduce harm. No single measure alone is likely to be effective in stopping scams; the measures are designed to work together to make it increasingly difficult for scammers to operate in the UK. The ability to spoof telephone numbers makes voice calls an attractive route for scammers. Blocking the most obviously spoofed numbers will make it harder for scammers to use voice calls to scam people. By reducing the number of scam calls received, it should contribute to a reduction in the number of people being scammed.

²⁵ Ofcom's [CLI guidance](#).

- 3.13 Given the scale of the harm from scams today (discussed further in Section 3 of our scams policy positioning statement²⁶), even a modest reduction in scam calls should deliver significant benefits. Research conducted by the Communications Consumer Panel (CCP) in 2020 found that around two thirds of people who fell for call scams lost more than £100 while 28% lost more than £500.²⁷ Victims are also likely to experience anxiety and emotional distress and, although these are less readily-quantifiable, such harms are likely to be significant. Any reduction in the volume of scam calls will also reduce harm to those who receive these calls but are not ultimately scammed, as unwanted calls can be annoying, disruptive and waste people's time.
- 3.14 Our proposal should also contribute to our second aim of improving confidence in CLI data and trust in telephone services. As discussed in Section 2, by requiring providers to block calls with inaccurate CLI data, our proposed changes will also improve the accuracy of CLI data provided on calls which do connect to consumers, helping them decide which calls they wish to answer. It will make it easier to trace problematic calls that continue to be made, as these calls are more likely to be using a CLI that will uniquely identify the caller. Improving the accuracy of CLI data will also improve the confidence in CLI data and trust in telephone services. This will benefit consumers, legitimate businesses and other genuine users of telephone services, as their calls are more likely to be answered. The impact on consumers and the wider economy of scam calls, and a loss of trust and confidence in the telephone services as a result of scams, are discussed in more detail in Section 3 of our scams policy positioning statement.²⁸
- 3.15 The specific changes to the CLI guidance setting out what is expected of providers to meet the requirements in GC C6 are described in the next section. We know that providers have already implemented some of these proposed changes on a voluntary basis (or are in the process of doing so). However, for those providers that have not, they will incur some additional costs to implement them. We discuss these costs and other potential impacts in Section 4. In most cases, we do not believe the incremental costs caused by our proposals will be significant. This is because existing regulatory requirements mean that many of the affected providers should already be undertaking related activities and so should have much of the technical capability in place already. Where this is the case, the new requirements can be met with relatively modest changes. There may also be benefits to some providers from our proposals: providers who deal directly with end consumers may find that a reduction in the number of scam calls leads to fewer calls from end customers to their customer service teams.
- 3.16 Overall, we consider that the changes proposed to GC C6, and the associated changes to the CLI guidance, are likely to deliver material benefits as a result of a reduction in scam calls, and improved confidence in CLIs and trust in telephone services in general, and that these measures are proportionate.

²⁶ Ofcom, February 2022. [Tackling scam calls and texts: Ofcom's role and approach](#).

²⁷ Communications Consumer Panel (CCP), December 2020. [Scammed! Exploited and afraid: what more can be done to protect communications consumers from the harm caused by scams](#), page 4.

²⁸ Ofcom, February 2022. [Tackling scam calls and texts: Ofcom's role and approach](#).

Proposed implementation date

3.17 In order that consumers have the additional protection afforded by the proposed modification to GC C6.6, we consider it is important that it comes into force as soon as reasonably possible. Therefore, we propose that the modification to GC C6.6, and the changes to the CLI guidance set out in Section 4, come into force six months after the publication of our statement (which is planned for Autumn 2022).

Legal tests

3.18 We consider that the modification we are proposing to make to GC C6.6 meets the test for setting or modifying conditions set out in section 47(2) of the Act. It is:

- a) **objectively justifiable**, in that it will ensure, so far as possible, that CLI data is accurate, and calls with inaccurate CLI data are identified and blocked. This will bring direct benefits to consumers, in particular helping to tackle scam and nuisance calls, and improving people's trust in CLI data and UK telephone services;
- b) **not unduly discriminatory**, because it will apply to all providers who provide networks or voice call services and will benefit all consumers equally;
- c) **proportionate**, in that it goes no further than is necessary to achieve Ofcom's objectives of reducing the harm to consumers from scam calls and improving trust in CLI and the UK telephone system. Whilst there are likely to be costs to providers of implementing these changes, we do not consider these likely to be disproportionate relative to the gains to end consumers and legitimate businesses; and
- d) **transparent**, as the reasons for and effect of the change that we are proposing to make are explained in this document.

Consultation question

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

4. Proposed changes to the CLI guidance

Introduction

4.1 The CLI guidance sets out what is expected of providers in order for them to meet the requirements in GC C6 and provides guidance for all providers that participate in the origination, transmission and termination of a call in the UK. We are proposing to make some changes to the CLI guidance in light of the proposed modification of GC C6.6. We are also proposing to make a number of other changes to the guidance clarifying our expectation on the types of numbers that should be used as CLI in response to feedback from providers.

Identifying and blocking calls which do not have valid, dialable CLI data which uniquely identifies the caller

4.2 In Section 3, we set out a proposed modification of GC C6.6 to require providers to identify and block calls with CLI data that does not uniquely identify the caller. We are therefore proposing a number of associated changes to the CLI guidance clarifying what we expect providers to do to identify and block calls that do not have valid, dialable CLI data which uniquely identifies the caller. In summary, this includes:

- clarifying that the format of a CLI should be a 10- or 11-digit number;
- making use of information that identifies numbers which should not be used as CLI, such as Ofcom's numbering allocation information and the Do Not Originate list;
- identifying calls originating abroad that do not have valid CLI and blocking them; and
- identifying and blocking calls from abroad spoofing UK CLI.

4.3 The provider originating a call has the contractual relationship with the caller and will know if the CLI used is one that is from a number range that has been allocated to that network, or they should seek assurance from their customer that they are using a CLI that they have permission to use.

4.4 Transit and terminating providers will not have access to all the information about the caller to determine whether the caller has authority to use the CLI that is being provided with the call. However, we propose to set out in the guidance steps that we consider transit and terminating networks should take to identify calls that do not have valid, dialable CLI data which uniquely identifies the caller.

4.5 Fraudsters based abroad often spoof UK CLIs to make scam calls to UK consumers. Presenting a UK CLI might encourage the recipient to believe that a call is from a legitimate source and they are more likely to answer it. Providers receiving calls into the UK public network from abroad have an important role to play to identify calls that contain spoofed numbers and prevent these from being connected to consumers. These proposals are intended to help providers identify spoofed numbers for calls originating in the UK and from abroad.

- 4.6 As discussed in paragraph 3.11, Ofcom’s aim when proposing these changes is to reduce the number of scam calls which reach end consumers. This should have a number of benefits – it should reduce the harms to call recipients from scam calls and also help improve confidence in UK CLIs and the telephone system.

For calls that originate on a UK network

Format of the CLI should include a 10- or 11-digit number

- 4.7 Ofcom manages the allocation of telephone numbers in the UK. The vast majority of telephone numbers that we issue are 10- or 11-digit numbers, although we do sometimes issue shorter telephone numbers for the purpose of access to certain types of services. This includes, for example, three-digit numbers such as 999 for access to the emergency services, or some 3- and 6-digit Non-Geographic Numbers which provide access to helplines for services of social value. However, these shorter numbers are not used for outbound calls.
- 4.8 We are proposing to add to the CLI guidance that the number used as a CLI should be a 10- or 11-digit number. This would mean that calls with a UK CLI which does not have 10- or 11-digits should be blocked. This clarification should not have an impact on genuine calls that originate in the UK because, as explained above, shorter numbers are not used as CLI for call origination. However, it will block calls that spoof the shorter non-geographic numbers. As this proposal only clarifies what is required of the CLI originating a call, calls to short numbers, such as 999, are not affected.
- 4.9 We do not consider that this proposed change will impose any significant costs on providers. This is because providers are already required to block invalid CLIs where technically feasible, meaning they should already have the technical capability to block calls using a block list. The proposed change means that providers will need to update their block lists to block calls with a UK CLI which does not have 10- or 11-digits (if they do not already). Any one-off costs associated with this change should be small.

Providers should identify and block CLIs which should not be used for outbound calls (such as by use of the DNO list)

- 4.10 All providers are already required to check that the CLI data provided with a call contains valid and dialable CLI and should continue to use numbering allocation information to ensure that only valid number ranges are used. As mentioned in paragraph 3.5, Ofcom publishes the National Numbering Scheme, which provides a record of number blocks that have been allocated to providers. We also publish a list of long-term protected number ranges which are not available for allocation, adoption or use.²⁹ These lists provide a reference point to help determine valid UK numbers and all providers should use this information to determine whether the CLI provided with a call is from a valid number range.

²⁹ This list is available under the ‘Check telephone number availability’ heading on our [telecoms numbering web page](#).

- 4.11 However, valid numbers can be spoofed. There are some valid numbers which are only used for inbound calls and will never be used as a CLI for an outbound call. These may be customer contact numbers for large businesses or government bodies, whose numbers may be widely available. For a number of years, Ofcom has compiled a ‘Do Not Originate’ (DNO) list, comprised of such numbers, where we have been informed they are not used for outbound calls.³⁰ If numbers from the DNO list are used as CLIs, the number will have been spoofed and the CLI will not uniquely identify the caller.
- 4.12 Therefore, we propose to add to the CLI guidance the expectation that transit and terminating providers should use the DNO list to identify and block such calls. The DNO list is already used by the largest fixed and mobile providers in the UK, but some other providers will need to implement this type of blocking into their network. Providers can request access to this list by email to DNO@ofcom.org.uk.
- 4.13 Providers may also have other sources of information relating to spoofing, such as customer complaints and information from other parties who may have identified spoofed numbers which are in use. We expect providers to use any additional information to which they have access to identify and block calls that have spoofed CLI data.
- 4.14 As we note above, the DNO list is already used by the largest providers. Those providers using the whole DNO list, and who are engaged fully in accessing sources of information about spoofed calls, will be compliant with our proposal and hence unlikely to face any extra costs.
- 4.15 We do not consider that this proposal to assess the numbers against the DNO list will impose significant additional costs on providers. As transit and terminating providers are already required to check that the CLI data provided with a call contains a valid and dialable CLI, they should already have the capability to assess the CLI data of calls that enter their network and to periodically update this list. They may have a small cost to modify their system to also check for numbers on the DNO list and to have the ability to update the numbers on this list.

Calls originating on networks outside the UK

- 4.16 Calls that enter the UK from abroad will originate on networks where our General Conditions do not apply. UK providers who receive these calls have an important role to ensure that only calls which meet the requirements in the General Conditions are connected to the recipient of the call.
- 4.17 As we explain in Section 2, the role of CLI data is to inform the recipient of a call about the identity of the party making the call. Therefore, it is important that only valid CLI data is presented to the recipient of the call.

³⁰ Further detail on the DNO list is included on our website: [‘Do Not Originate’ \(DNO\) list](#).

Blocking calls with invalid CLI that originate abroad

- 4.18 For calls that originate on a network outside the UK where the General Conditions do not apply, there is currently an option in the CLI guidance for the provider who receives the call into the UK public network to replace a CLI that they do not trust with a number from a range that has been allocated to them for this purpose.³¹ This opens up a potential vulnerability whereby scam calls from abroad with invalid CLIs have their CLIs replaced with the special number by the ingress provider. Furthermore, as the UK CLI that is inserted is marked as withheld, the recipient of the call will not have any information provided with the call to help them determine if they wish to answer it.³²
- 4.19 It is important that recipients of calls have accurate information about the calling party to decide if they wish to answer a call. Therefore, we are now proposing, when calls originate on a network outside the UK and the provider at the point of ingress considers the number to be an invalid CLI, that such calls should be blocked.
- 4.20 This change would affect the providers who receive calls into the UK public networks from abroad. Providers should use information to which they have access to determine if the CLI provided with the call is a valid and dialable number. As a minimum the CLI should comply with the format for international telephone numbers as set out in ITU-T numbering plan E.164.³³ Some providers may have access to other information about numbering, such as numbering allocation in the country where the call was originated, and we would encourage providers to use this information to ensure that only calls with valid and dialable CLI are connected to the call recipient.
- 4.21 There is a risk that consumers are harmed if some legitimate calls are blocked as a result of this proposed change. This could happen if a legitimate caller from abroad has requested to withhold their CLI and their provider has removed the CLI data from the call, or where CLI data is corrupted as the call has been passed between different networks. It could also be due to countries having different rules on the provision of CLI data with a call. It is difficult to assess the extent of this issue in advance or quantify the potential harm to consumers though we have no reason to expect it to be large.
- 4.22 To mitigate this risk, providers may be able to work with their international partners to improve how the integrity of the CLI data is maintained throughout a call, so that valid CLI data is provided on ingress to UK networks. For example, providers may build trusted relationships so that the privacy marking for calls can be respected. This would allow

³¹ See 4.15 of the current CLI guidance. This was introduced so that calls that were generated on a network outside the scope of our guidance could be connected to the recipient of the call even where the CLI data was deemed to be unreliable.

³² The replacement of the original CLI also means that the terminating provider may not be able to identify the originating country for the call. This means that the call termination rate for these calls is likely to be subject to rates dependent on commercial negotiations, rather than the regulated rate where applicable. Our proposed change would mean that the terminating provider should always have access to the CLI data relating to the call and therefore the appropriate call termination rate can be charged.

³³ International Telecommunications Union, October 2010. [E.164: the international telecommunication numbering plan](#).

withheld CLI data to be provided to providers involved in the transmission of the call, as the terminating network can be trusted to not display it to the recipient.

- 4.23 We do not consider that this proposed change to the guidance will impose any significant costs on providers. This is because providers should already be able to identify calls from international networks that have problematic CLIs, as they are already required to identify and label such calls. Under our proposal, instead of labelling these calls, providers will need to block them instead. This is likely to involve making a small change to their systems.

Calls originating from abroad that use a UK CLI

- 4.24 There are two numbers associated with CLI data, the Presentation Number³⁴ and the Network Number. The Network Number identifies the fixed ingress into the public network or a subscriber that has non-fixed access to the public network. Calls from abroad should not use UK CLI as a Network Number, except in a limited number of legitimate use cases, which are set out in paragraph 4.17 of the proposed revised guidance at Annex 2.³⁵ Providers have developed guidance on blocking inbound international calls with UK CLI as a Network Number via NICC, the industry standards body, in ND1447.³⁶
- 4.25 Scammers may spoof a UK CLI so that a call from abroad appears to have originated in the UK. Therefore, we propose that the CLI guidance states that providers should identify and block calls from abroad which are not within the legitimate use scenarios specified in the guidance. This proposal would mean that for cases falling outside these use scenarios, callers and providers outside the UK would not be able to use a UK CLI as a Network Number. The Network Number should be one that accurately represents the origin of the call or where the call has first connected to the public network.
- 4.26 We note that some providers have already implemented this type of blocking in their networks and we understand that others have plans to roll it out. However, all providers who receive traffic from outside the UK need to do so in order that such calls are not connected to UK consumers through a provider who has not implemented it.
- 4.27 We also note that legitimate calls from overseas, such as call centres that operate on behalf of a UK business, will not be blocked. In paragraph 4.17 of the proposed CLI guidance at Annex 2, we set out an exemption for calls from UK customers hosted onto an overseas node, where this traffic should be routed over a pre-agreed interconnect.³⁷ Callers from abroad can also continue to use a UK CLI as a Presentation Number provided that the Network Number identifies the source of the call, for example by using a number from the country where the call has originated.
- 4.28 While blocking calls that spoof a UK CLI as a Network Number should help reduce the volume of potentially harmful calls entering UK networks, we recognise it will not

³⁴ The Presentation Number is a number nominated or provided by the caller that can identify the caller or be used to make a return or subsequent call.

³⁵ [Annex 2: \[Draft\] Guidance on the provision of Calling Line Identification facilities and other related services](#)

³⁶ NICC, April 2021. [ND1447: guidance on blocking of inbound international calls with UK Network Number as CLI \('ND1447'\)](#)

³⁷ [Annex 2: \[Draft\] Guidance on the provision of Calling Line Identification facilities and other related services](#)

completely stop scam and nuisance calls that originate from abroad. For example, scammers may move to spoofing UK mobile numbers or use an international number as a Network Number instead. However, people are likely to expect established businesses to call them on a geographic or non-geographic number, rather than a mobile number. Therefore, preventing scammers from originating calls abroad that spoof a UK CLI as a Network Number should make it harder for those scammers to execute fraud involving the misrepresentation of a business.

- 4.29 In the main, it is the larger providers who receive calls from a network abroad and connect these to the UK public network. We understand that many of these providers are already planning to implement this type of blocking into their network and a small number have already completed their implementation. It is unlikely that such operators will face any extra costs from these proposals. However, for those smaller providers who have no plans to implement this type of call blocking, one off changes to their systems will likely be required, which will result in some additional systems costs.
- 4.30 Providers may also need to liaise with their international interconnecting partners to ensure that calls that have a legitimate reason to use a UK CLI as a Network Number can be routed through a recognised route and these calls are not blocked. We consider that these incremental costs are likely to be administrative and technical in nature and may involve both one off and ongoing costs.

Other changes to the CLI guidance based on feedback from providers

- 4.31 We have received some requests for clarification of other elements of the CLI guidance.

CLIs that generate an excessive or unexpected call charge

- 4.32 The CLI guidance currently states that the Presentation Number, i.e. the CLI which is displayed to the recipient of the call, “must not be a number that connects to a Premium Rate Service (e.g. prefixed 09), or a revenue sharing number that generates an excessive or unexpected call charge”. The intention of this requirement is that consumers should not incur unexpected call charges if they place a return or subsequent call to a number that has called them. We have received enquiries from providers as to what we mean by “an excessive” call charge.

Prohibition on the use of 09 non-geographic numbers

- 4.33 We propose to specify in our guidance that the prohibition applies to 09 non-geographic numbers only, i.e. numbers starting 090, 091 and 098. This is where there is the greatest scope for consumer harm from unexpected call charges, as the applicable service charge is currently set in the Numbering Plan at a maximum of 300 pence per minute, where the Service Charge comprises or includes a pence per minute rate, or 500 pence per call where

the Service Charge is set at a pence per call rate. This is significantly higher than the Service Charge set for 084 and 087 non-geographic numbers.³⁸

- 4.34 We consider that the specification should help meet Ofcom’s objective of providing greater clarity to providers as to how to manage CLIs. It should therefore be beneficial to industry stakeholders. There will be no change for consumers as they should already not receive calls with 09 CLIs.
- 4.35 This clarification should not require any direct changes (technically or administratively) for providers and so is not expected to result in any costs. The current CLI guidance already states that a Presentation Number must not be a number that connects to a Premium Rate Service (e.g. prefixed 09), so premium rate numbers starting 090, 091 and 098 should already not be used as Presentation Numbers.

Use of 084 and 087 non-geographic numbers

- 4.36 We are currently considering the future role of 084 and 087 non-geographic numbers as part of our Future of Telephone Numbers review.³⁹ That review is looking at the rules that govern the use of numbers in the UK to ensure that they continue to promote consumer confidence in telephone services. Our review has found the potential for consumer harm due to concerns about call costs, including uncertainty about those costs, for calls to 084 and 087 numbers.
- 4.37 In order to increase pricing transparency, we require that when a service provider advertises, promotes or procures the advertisement or promotion of 084 and 087 numbers (as well as 09 non-geographic numbers and 118 directory enquiry numbers), it must include the Service Charge in a prominent position and in close proximity to the number.⁴⁰ However, using an 084 or 087 Presentation Number as the CLI does not provide an opportunity to advertise the Service Charge. This can result in unexpected call charges if a caller makes a return or subsequent call.
- 4.38 As part of the Future of Numbering review we are seeking further evidence to understand how 084 and 087 numbers are being used and their value to consumers.⁴¹ To inform the review and this consultation on the CLI guidance, we would like to explore the use of 084 and 087 numbers as Presentation Numbers, as well as the impact of potentially prohibiting that use. For instance, the revenue sharing aspect of those numbers may incentivise ‘missed call’ scams, where 084 and 087 numbers form the presented CLI, leading to consumer harm through the unexpected cost of a return call. However, in considering whether it would be in the consumer interest to propose a prohibition on the use of 084 and 087 as Presentation Numbers, we also need to understand how to manage any impact

³⁸ Ofcom, December 2021. [National Numbering Plan](#).

³⁹ Ofcom, 2019. [Future of Telephone Numbers: First Consultation](#) and Ofcom, 2021, [Future of Telephone Numbers: Second Consultation](#).

⁴⁰ Ofcom, [Numbering Condition Binding Non-Providers](#).

⁴¹ Ofcom, 2021. [Future of Telephone Numbers: Second Consultation](#).

from such a proposal, e.g. the need to replace 084 or 087 Presentation Numbers if used for outbound calls for socially valuable services such as personal alarm systems.

- 4.39 We would welcome stakeholder views on the use of 084 and 087 as Presentation Numbers and any potential impact on prohibiting their use in the CLI guidance. However, at this stage, 10- and 11-digit numbers, other than 09 non-geographic numbers, can continue to be used as Presentation Numbers.

Use of non-geographic numbers as Network Numbers

- 4.40 In 2019 we consulted on whether non-geographic numbers could be used as Network Numbers, following a request for clarification from a provider.⁴² At the time, we identified that some providers already use non-geographic numbers as Network Numbers and therefore published a clarification that the CLI guidance did not expressly preclude the use of non-geographic numbers as Network Numbers.⁴³
- 4.41 However, as set out in Section 2 of this document, a fundamental principle of CLI is that the number provided with a call should represent the true source of that call. The Network Number is a number that should unambiguously identify the line identity of the fixed access ingress to the public network, or the subscriber or terminal/telephone that has non-fixed access to the network. Therefore, we consider that the Network Number should be either a geographic number for a fixed access ingress, or a mobile number for a call originating on a non-fixed network. We are proposing to add to the CLI guidance that, for calls that enter the network from a fixed access ingress, the Network Number should not be a non-geographic number, as this would not be associated with a particular fixed ingress. This would require providers to update CLI data for customers that are currently using a non-geographic number as a Network Number for such calls.
- 4.42 Where there is both a Network Number and a Presentation Number, the Network Number (unlike the Presentation Number) is not shown directly to an end user. Where previously the non-geographic number has been used as the sole CLI for that call, it can still be used as a Presentation Number, provided that the Network Number is a geographic number. In these call cases, there will be no direct implications for end users of these changes.
- 4.43 We also consider that this change should help to improve providers' confidence that the Network Number identifies the origination point of a call. It should therefore be beneficial to industry stakeholders. Hence, it should help meet Ofcom's objectives both of improving trust in CLIs and the UK telephone system and providing greater clarity to providers as to how to manage CLIs.
- 4.44 This proposed change will mean that companies who currently use non-geographic numbers as Network Numbers will have to update their CLI data to change these numbers to ensure that they reflect the true source of the call. We expect this to be a

⁴² Ofcom 2019. [Consultation on the Calling Line Identification guidelines: a consultation on the types of numbers that can be used as Network Numbers.](#)

⁴³ Ofcom, April 2020. [Deferred final statement: consultation on the Calling Line Identification guidelines.](#)

straightforward task, and any administrative cost associated with this will be minor and incurred only once. These companies will also have six months to make this change.

Display name information

- 4.45 In addition to the telephone number of the caller, some calling technologies, such as SIP, also permit the inclusion of an optional display name field. CLI data is defined in the General Conditions as *“the contents of all signaling messages which can be used between Communications Providers and/or between Communications Providers and End-Users to signal the origin of the call and/or the identity of the calling party, including any associated privacy markings.”* Hence, CLIs may include the display name information. We propose to clarify in the CLI guidance that CLI data may also include an optional display name field.
- 4.46 As we set out in Section 2, it is important that CLI data accurately identifies the caller. Therefore, we are also proposing to state in the CLI guidance that display name information should not be displayed to the call recipient unless the provider is confident that it is accurate. As there is currently no set standard for the provision of display name information, it is unlikely that a provider will be confident of this information unless they are also the originating provider of the call or they have a way to verify this information with the originating provider.
- 4.47 We consider that this clarification to our guidance offers potential benefits to both providers and end users. First it makes clear that providers can invest in display name CLIs. This enables an area of potential innovation in the provision of CLI which could benefit both the innovating providers and end consumers receiving new services.
- 4.48 Second, it should further benefit people using voice calls by protecting them via the requirement for accuracy in display name CLIs. This should help meet Ofcom’s objective of improving trust in CLIs and the UK telephone system.
- 4.49 Finally, those providers who begin to use display names within CLIs will benefit, as they will have increased clarity as to what they must do to be compliant, which should reduce their risks of being non-compliant with their obligations. Therefore, this clarification should help meet Ofcom’s objective of providing greater clarity in the guidance to providers as to how to manage CLIs.
- 4.50 Display name information is not commonly used by providers in the UK. It is an optional feature that could enable providers to innovate in this area, if they can fulfil the accuracy requirements. Therefore, this change to our CLI guidance would only affect costs to providers if they chose to provide this feature. We consider it likely that they would only do so if they felt that the benefits to their business outweighed the costs.

Proposed implementation date

- 4.51 The CLI guidance sets out what we expect providers to do to comply with GC C6. In paragraph 3.18, we proposed that the modification to GC C6.6 should come into force six months after the publication of our statement (which is planned for Autumn 2022). To

support the proposed modification, we propose that the changes to the CLI guidance set out in this section come into force at the same time.

Consultation question

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.
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?

A1. Notification of proposed modification to the General Conditions under sections 48(1) and 48A(3) of the Act

- A1.1 Ofcom, in accordance with sections 48(1) and 48A(3) of the Act, hereby makes the following proposal for modifying General Condition C6.
- A1.2 The proposed modification is set out in Schedule 1 to this Notification.
- A1.3 Ofcom's reasons for making the proposal and the effect of the proposal is set out in the document accompanying this Notification.
- A1.4 Ofcom considers that the proposal complies with the requirements of sections 45 to 49C of the Act, insofar as they are applicable.
- A1.5 In making the proposal, Ofcom has considered and acted in accordance with its general duties under section 3 of the Act and the six requirements set out in section 4 of the Act. Ofcom has also had regard to the Statement of Strategic Priorities in making the proposal referred to in this Notification.
- A1.6 Representations may be made to Ofcom about the proposal set out in this Notification by 20 April 2022 at 5pm.
- A1.7 If implemented, the proposed modification shall enter into force on the date specified in the final Notification relating to this proposal.
- A1.8 A copy of this Notification and the accompanying consultation document has been sent to the Secretary of State in accordance with section 48C(1) of the Act.
- A1.9 In this Notification:
- a) 'the Act' means the Communications Act 2003;
 - b) 'General Conditions of Entitlement' or 'General Conditions' means the general conditions set by Ofcom under section 45 of the Act on 19 September 2017, as amended or replaced from time to time;
 - c) 'Ofcom' means the Office of Communications;
 - d) 'Statement of Strategic Priorities' means the Statement of Strategic Priorities for telecommunications, the management of radio spectrum, and postal services designated by the Secretary of State for Digital, Culture, Media and Sport for the purposes of section 2A of the Communications Act 2003 on 29 October 2019.
- A1.10 Words or expressions shall have the meaning assigned to them in this Notification, and otherwise any word or expression shall have the same meaning as it has in the Act.
- A1.11 For the purposes of interpreting this Notification: (i) headings and titles shall be disregarded; and (ii) the Interpretation Act 1978 shall apply as if this Notification were an Act of Parliament.

A1.12 The Schedules to this Notification shall form part of this Notification.

Signed by

A handwritten signature in black ink, appearing to read 'F. Farragher', with a long horizontal stroke extending to the right.

Fergal Farragher

Director – Telecoms Consumer Protection

A person authorised by Ofcom under paragraph 18 of the Schedule to the Office of Communications Act 2002

23 February 2022

Schedule 1: Proposed modification to the General Conditions of Entitlement C6

A1.13 The modification that Ofcom proposes to make to General Condition C6 is shown below as against the current version of the General Condition. The text shown in strikethrough will be deleted and the text underlined will be added.

C6.6 Where technically feasible **Regulated Providers** must:

- a) take all reasonable steps to identify calls, other than calls to **Emergency Organisations**, in relation to which ~~invalid or non-dialable~~ the CLI Data provided is invalid, non-dialable or does not uniquely identify the caller is provided; and
- b) prevent those calls from being connected to the called party, where such calls are identified.

A2. The CLI guidance with proposed changes

- A2.1 The CLI guidance with proposed changes can be found here: [Annex 2: \[Draft\] Guidance on the provision of Calling Line Identification facilities and other related services](#).
- A2.2 Proposed additions to the CLI guidance are **highlighted in yellow** and underlined; proposed deletions are **highlighted in yellow** and ~~struck through~~. Minor changes such as formatting of footnotes, and spelling and grammatical changes are not marked up.

A3. Responding to this consultation

How to respond

- A3.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on 20 April 2022.
- A3.2 You can download a response form from <https://www.ofcom.org.uk/consultations-and-statements/category-2/improving-cli-data-accuracy>. You can return this by email or post to the address provided in the response form.
- A3.3 If your response is a large file, or has supporting charts, tables or other data, please email it to scamsconsultations@ofcom.org.uk, as an attachment in Microsoft Word format, together with the [cover sheet](#).
- A3.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Scams Consultations
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- A3.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- Send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files. Or
 - Upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A3.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A3.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt if your response is submitted via the online web form, but not otherwise.
- A3.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A3.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex 6. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.
- A3.10 If you want to discuss the issues and questions raised in this consultation, please contact the scams team at scamsconsultations@ofcom.org.uk.

Confidentiality

- A3.11 Consultations are more effective if we publish the responses before the consultation period closes. In particular, this can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish all responses on [the Ofcom website](#) as soon as we receive them.
- A3.12 If you think your response should be kept confidential, please specify which part(s) this applies to, and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A3.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A3.14 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our [Terms of Use](#).

Next steps

- A3.15 Following this consultation period, Ofcom plans to publish a statement in Autumn 2022.
- A3.16 If you wish, you can [register to receive mail updates](#) alerting you to new Ofcom publications.

Ofcom's consultation processes

- A3.17 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 4.
- A3.18 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A3.19 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A4. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

- A4.1 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

- A4.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A4.3 We will make the consultation document as short and simple as possible, with a summary of no more than two pages. We will try to make it as easy as possible for people to give us a written response. If the consultation is complicated, we may provide a short Plain English / Cymraeg Clir guide, to help smaller organisations or individuals who would not otherwise be able to spare the time to share their views.
- A4.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A4.5 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A4.6 If we are not able to follow any of these seven principles, we will explain why.

After the consultation

- A4.7 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish all the responses on our website as soon as we receive them. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A5. Consultation coversheet

BASIC DETAILS

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts? _____

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

A6. Consultation questions

The full list of consultation questions is set out here.

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

A7. Glossary and abbreviations

Calling Line Identification (CLI): means data that enables identification of the number from which a call could be made or to which a return call could be made.

CLI data: means the contents of all signalling messages which can be used between Communications Providers and/or between Communications Providers and End-Users to signal the origin of the call and/or the identity of the calling party, including any associated privacy markings.

CLI authentication: implementation of standards that make it possible for the network originating a call to confirm the caller's authenticity before passing it to the network of the person receiving the call.

Do not originate (DNO) list: a list, set up by Ofcom and UK Finance, of telephone numbers used only for inbound calls that would not be used to call consumers.

General Conditions (GCs): conditions set by Ofcom under section 45 of the Communications Act 2003.

Geographic number: a telephone number that is identified with a particular geographic area.

IP calling: the ability to make phone calls over the internet.

Network number: a telephone number that unambiguously identifies the line identity of the fixed access ingress to or egress from a Public Electronic Communications Network or a subscriber or terminal/telephone that has non-fixed access to a Public Electronic Communications Network.

Non-geographic number: any telephone number other than a geographic number

Presentation number: a number nominated or provided by the caller that can identify that caller or be used to make a return or subsequent call. It may not necessarily identify the line identity of the geographic source of the call.

Provider: communications provider, defined in section 405(1) of the Communications Act 2003 as meaning a person who (within the meaning of section 32(4)) provides an electronic communications network or an electronic communications service. See paragraph 3.2 on the scope of GC C6.

Scam calls and texts: calls and texts primarily aimed at defrauding consumers, either by tricking them into revealing personal details or into making a payment.

Spoofing: where callers hide their identity by causing a false or invalid phone number to be displayed when making calls. Those making such calls will create a phone number that appears like a phone number or may even mimic the number of a real company or person who has nothing to do with the actual caller.