

## **Verizon response to Ofcom’s “Consultation on changes to the General Conditions of Entitlement – Changes to General Condition C6, other minor drafting changes and changes to the guidance on the Calling Line Identification facilities”**

### **Introduction**

1. Verizon Enterprise Solutions (“Verizon”) welcomes the opportunity to respond to Ofcom’s “Consultation on changes to the General Conditions of Entitlement – Changes to General Condition C6, other minor drafting changes and changes to the guidance on the Calling Line Identification facilities”.<sup>1</sup>
2. Verizon is the global IT solutions partner to business and government. As part of Verizon Communications – a company with nearly \$131 billion in annual revenue – Verizon serves 98 per cent of the Fortune 500. Verizon caters to large and medium businesses and government agencies and is connecting systems, machines, ideas and people around the world for altogether better outcomes.
3. Please note the views expressed in this response are specific to the UK market environment and regulatory regime and should not be taken as expressing Verizon’s views in other jurisdictions where the regulatory and market environments could differ from that in the UK.

### **Response to consultation**

4. While we agree with the principle that calls to emergency services should never be blocked, we have continued concerns about the ability for smaller providers to comply technically with the amended General Condition C6 and Calling Line Identification (CLI) Guidance.
5. As detailed in our response<sup>2</sup> to the earlier consultation in September 2017,<sup>3</sup> there is a disconnect between the expectations that Ofcom has of providers, and the

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<sup>1</sup> [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0010/113401/Consultation-on-changes-to-the-General-Conditions-of-Entitlement.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0010/113401/Consultation-on-changes-to-the-General-Conditions-of-Entitlement.pdf)

<sup>2</sup> Verizon, submitted November 2017. Non-confidential version available here:  
[https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0025/109618/Verizon.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0025/109618/Verizon.pdf)

<sup>3</sup> [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0020/106391/Guidelines-for-CLI-Facilities.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0020/106391/Guidelines-for-CLI-Facilities.pdf)

limitations relating to “technical feasibility”<sup>4</sup> in the relevant General Condition C6 and the related CLI Guidance.

6. Technical feasibility in particular varies by provider depending on network age, build and technology employed. Providers running equipment which is close to end of life may not be able to comply with the requirements. [X - Redacted]
7. We would also refer Ofcom back to our response to the CLI Guidance consultation in September 2017 in which we set out our wider concerns about the CLI Guidance proposals including technical and principled concerns around the blocking of calls with invalid CLI.
8. While we acknowledge that Ofcom has the caveat in General Condition C6.6 of the requirements only being implemented “where technically feasible”, Ofcom has made clear that it wants providers to have clear plans with implementation timelines.<sup>5</sup> This subjective caveat leaves providers whose equipment is not capable of complying with the requirements at this time in a difficult and damagingly uncertain regulatory environment.
9. Finally, as a general point, Ofcom needs to ensure that it looks at the telecommunication industry as a whole, rather than focus on the larger consumer-facing providers. Without this broader view, Ofcom risks proposing new rules and requirements which cannot be complied with by the long tail of smaller providers, or those serving specific categories of customer, who make up the UK’s telecommunications industry. The result is putting added economic and regulatory pressures on smaller providers who have simply not been taken account of in the impact analysis of Ofcom’s proposals. Verizon would be keen to know how Ofcom intends to address this in future.

Verizon Enterprise Solutions  
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<sup>4</sup> See General Condition C6.6 for example.

[https://www.ofcom.org.uk/data/assets/pdf\\_file/0023/106394/Annex-14-Revised-clean-conditions.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0023/106394/Annex-14-Revised-clean-conditions.pdf)

<sup>5</sup> See Ofcom’s statement accompanying the revised CLI Guidance, paragraph 3.64,

[https://www.ofcom.org.uk/data/assets/pdf\\_file/0012/113214/statement-guidelines-cli-facilities.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0012/113214/statement-guidelines-cli-facilities.pdf)