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# Submitting numbers to the ‘Do Not Originate’ list

Guide for organisations

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**GUIDE**

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# 1. Introduction

- 1.1 Ofcom is the regulator for the UK telecommunications sector and has been working to reduce the harm to consumers from unwanted calls for some time. Unwanted calls can take a variety of forms, ranging from nuisance calls to scams. Nuisance calls include unwanted attempts to promote a product or service (marketing calls), as well as silent and abandoned calls. Scam calls are different from other types of nuisance calls and are primarily aimed at defrauding consumers, either by tricking them into revealing personal details or into making a payment.
- 1.2 Ofcom has several workstreams to tackle scam calls. One of these is to encourage providers to block, divert, prevent and/or disrupt call attempts where the numbers used have been spoofed.<sup>1</sup> Furthermore, providers must comply with our General Conditions (GCs).<sup>2</sup> GC C6 requires that providers ensure, so far as technically feasible, that any CLI data provided or associated with a call includes a valid, dialable number which uniquely identifies the caller, and take all reasonable steps to identify calls that have invalid or non-dialable Calling Line Identification (CLI) data<sup>3</sup> and prevent these calls from being connected to the called party.<sup>4</sup>

## The DNO List

- 1.3 Many organisations in the UK are assigned a block of telephone numbers that can be used for their business requirements. Some numbers may never be used by the organisation to make outgoing calls, as the number is reserved for inbound calls only. Any outgoing calls appearing to originate from these inbound-only numbers will be spoofed and will not be a genuine call from the organisation.
- 1.4 Scammers exploit the fact that consumers may not know that these numbers are used for inbound calls only. Consumers may be more likely to trust a call coming from a number associated with a known organisation and fall victim to a scam.
- 1.5 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.<sup>5</sup> We refer to this as the 'Do Not Originate' (DNO) list. Outbound calls from numbers on the DNO list will be

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<sup>1</sup> 'Spoofing' is 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.

<sup>2</sup> Ofcom, [General Conditions](#).

<sup>3</sup> Calling Line Identification (CLI) is the data that enables identification of the number from which a call could be made or to which a return call could be made.

<sup>4</sup> Ofcom is also consulting on relevant amendments to GC C6 and the CLI guidance, see Ofcom, February 2022. [Improving the accuracy of Calling Line Identification \(CLI\) data](#).

<sup>5</sup> Call blocking or filtering services use technology to block or filter unwanted and nuisance calls on behalf of the consumer, for example via an app or hardware that is installed on a fixed line.

blocked at the network level by providers (where technically feasible) and at the presentation level by call blocking and filtering services.

- 1.6 The DNO list is intended to protect numbers whose illegitimate use is likely to lead to the most harm to consumers e.g. the number on the back of a debit card, because the call could credibly be from your bank. These numbers would never be used legitimately to call consumers – they are only ever used to receive calls.
- 1.7 It is not possible to distinguish between a legitimate outbound call and a spoofed outbound call, so all outbound calls from numbers on the DNO list will be blocked where technically feasible. **Therefore, any number that your organisation may use to make outgoing calls should not be added to the DNO list.**<sup>6</sup>
- 1.8 It is important to note that adding a number to the DNO list does not guarantee that all call attempts will be blocked. Whilst the majority will be, technical constraints may mean that a small number of calls are still connected. These constraints relate to the technology available on the networks involved, the route the call takes across networks and whether the providers of the networks apply the DNO list.<sup>7</sup> The DNO list should be treated as a complement to other action your organisation takes to protect the public from nuisance and scam calls.

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<sup>6</sup> This would therefore, in all but exceptional cases, exclude residential numbers.

<sup>7</sup> Ofcom is also consulting on relevant amendments to GC C6 and the CLI guidance, see Ofcom, February 2022. [Improving the accuracy of Calling Line Identification \(CLI\) data.](#)

## 2. Adding numbers to the DNO list

- 2.1 The DNO list cannot tackle all spoofed calls using inbound-only numbers. This is because there are currently limitations on the volume of numbers that some providers are able to block on their networks. Therefore, the numbers included on the list are those which are at high risk of being spoofed and where spoofing has the potential to cause significant consumer harm. Examples include telephone numbers used by banks and government agencies for inbound calls.

### Factors taken into account

- 2.2 Ofcom will consider requests to add numbers to the DNO list taking into account factors such as:
- the type of organisation which uses the number for inbound calls;
  - whether the number is publicly available and, if so, the extent to which consumers are aware of it;
  - the risk of successful impersonation using the number;
  - the number of consumers that could be harmed by spoofing of the number;
  - the degree of potential harm to those consumers; and
  - reported scam activity.
- 2.3 Submitters should provide information relevant to the above factors, along with their inbound-only numbers, to enable Ofcom to assess whether a number can be added to the DNO list. The list of factors is not exhaustive. It is in Ofcom's discretion whether or not to add a number to the DNO list, taking into consideration the objective of the list and the nature of the request.

### Intermediaries

- 2.4 Intermediaries may manage DNO list submissions, and requests to remove numbers from the list, on behalf of organisations they represent. Ofcom will consider requests made by intermediaries representing organisations that wish to add numbers to the list.
- 2.5 The intermediary should provide information as set out above to enable Ofcom to assess whether a number should be added to the DNO list. In addition, the intermediary must provide:
- details of the organisation it represents;
  - a valid letter of authority to submit the request, from the organisation it represents; and
  - evidence that the intermediary and the organisation have taken the steps set out below in paragraph 2.8 by providing supporting documentation.

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2.6 It is in Ofcom's discretion whether or not to add a number submitted by an intermediary to the DNO list, taking into consideration the objective of the list and the nature of the request.

2.7 The DNO list is managed by Ofcom and should not be used for promotional purposes.

## Steps to take prior to submission

2.8 There are a number of steps that need to be completed before submitting numbers to Ofcom for the DNO list.

- a) Review the section 'Adding numbers to the DNO list' and consider if the number is suitable to be submitted to Ofcom.
- b) Gather relevant information to enable Ofcom to assess whether the number should be added to the list.
- c) Nominate a 'responsible person' within your organisation to act as a main point of contact for Ofcom. This person will need to confirm that they have read this guide.
- d) The responsible person will need to ensure all relevant parts of the organisation have signed off on the number/s being added to the DNO list. The responsible person must confirm this in writing when submitting the number/s. It causes reputational harm and wasted resource when errors are made.
- e) At least one secondary contact will also need to be provided in case Ofcom is unable to get in touch with the responsible person.

## 3. Submitting numbers for the DNO list

- 3.1 Submitters should provide the numbers they would like included on the DNO list, information relevant to the factors set out in paragraph 2.2 to enable Ofcom to assess whether a number should be added to the DNO list and should provide documentation to show that the steps set out in paragraph 2.8 have been followed.

### Format of information

- 3.2 Numbers should be submitted to Ofcom as set out below:

- Where you are submitting more than one sequential phone number, please list each number individually and provide the range.<sup>8</sup> When providing the range, please use a dash and not a minus sign.
- Do not put any spaces between the numbers within a phone number.
- Submit numbers as a CSV file and not within the email body.
- If submitting more than five numbers, please provide the list of numbers in order of priority (reflecting the factors that Ofcom considers in paragraph 2.2). Some providers have limitations on the volume of numbers that can be added to their systems, as noted above, and so we will prioritise numbers where necessary.
- Ensure the "+44" or "0044" or "44" is removed from the beginning of the numbers. All numbers should start with a "0".
- The data should be provided in columns, which are to be headed as below:

CLI	Phone number	Date added	Requestor name
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- 3.3 Check for duplicates and remove them.
- 3.4 Information relevant to the factors set out in paragraph 2.2 and showing that the steps in paragraph 2.8 have been followed should be included in a separate attachment.

### When and how to submit numbers

- 3.5 Send all submissions to [dno@ofcom.org.uk](mailto:dno@ofcom.org.uk) by the 20th of the month (or the next working day, where the 20th falls on a weekend). If we receive submissions after this date the numbers may not be added to the list until the next month. This is because the approval process can take several days, depending on the nature of the request and the checks that need to be undertaken.
- 3.6 If you consider any numbers require urgent addition to the DNO list, please highlight this to Ofcom with your justification.

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<sup>8</sup> For example, if submitting numbers 120, 121, 122 and 123, you should note **both** the following:  
- '120, 121, 122, 123'  
- '120-123'

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- 3.7 Ofcom will assess whether a number should be added to the DNO list as set out in the section 'Adding numbers to the DNO list'.

## Sharing of the DNO list

- 3.8 The DNO list is shared by Ofcom with telecoms providers, their intermediaries, and parties such as call blocking or filtering services, who can block outgoing calls from numbers on the list. New numbers will be forwarded by Ofcom to the providers and other organisations in the first week of the month.
- 3.9 Where blocking is urgent, Ofcom will endeavour to issue the DNO list update to providers within one working day of receiving a new submission from a submitter.

## Blocking of numbers

- 3.10 Providers and other organisations blocking numbers will add numbers to their blocking systems within two working days of receiving the list (where this is technically possible), or as soon as possible.
- 3.11 Ofcom will not confirm with submitters when providers or other organisations have added numbers to blocking systems.

## 4. Removal of numbers from the DNO list

- 4.1 If a number was erroneously submitted and added to the DNO list, submitters can request the removal of that number.
- 4.2 The submitter must ensure that all relevant parts of the organisation have signed off on the number/s being removed from the DNO list. It causes reputational harm and wasted resource when errors are made. The responsible person must make the request for removal of the number from the DNO list in writing, by sending an email to [dno@ofcom.org.uk](mailto:dno@ofcom.org.uk).
- 4.3 The numbers must be in the format indicated in paragraph 3.2. The request to remove the block will be sent with the next month's DNO list update.
- 4.4 Where removal is urgent, please highlight this to Ofcom and, if Ofcom agrees, it will endeavour to contact the providers and other organisations blocking the number by email within one working day of agreeing to the urgent removal.
- 4.5 Providers and other organisations that were blocking the number will remove the block within one working day (where this is technically possible).