Your response

Question	Your response
Question 1: Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.	*Is this response confidential? – Yes / No (delete as appropriate)*
Question 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 pro-vide reasons why a different date would be appropriate.	*Is this response confidential? – Yes / No (delete as appropriate)*
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.	*Is this response confidential? –No* Proposed comments to the **Draft of the Guidance on the provision of Calling Line Identification facilities and other related services** **Change:** 4.14 In addition to ensuring that CLI Data is populated properly, General Condition C6 also places an obligation on all CPs to take steps to prevent calls that have invalid or non-dialable CLIs, or where the CLI does not uniquely identify the caller, from reaching the called party. For the originating CP, this means they should not initiate calls that have invalid or non-dialable CLIs as Presentation Numbers or where they are unable to confirm that the caller has the permission to use the number, as set out in 4.13. **AB Handshake comment**: The ultimate source of information on whether a caller has the permission to use a certain number is the originating CP. However, in many cases the terminating CP will receive the call via a chain of intermediate carriers. In this case the mentioned requirement is best achieved if there was a direct connection between the originator and terminator of the call for real-time CLI verification.

Change: 4.21 The transit or terminating provider should block calls that do not have valid or dialable CLI, or where they have information indicating that the CLI should not be used and therefore that it does not uniquely identify the caller.

AB Handshake comment:
For traffic coming from abroad the extent to which national transit or terminating providers can attest the true origin of the call and / or identity of the caller is close to zero. The requirement to block traffic with invalid CLIs (as in non-compliant with the numbering plan of the originating country) is legit, but this covers only a fraction of the harmful calls targeting the customers of the terminating CPs. Typically for such scams fraudsters use either dialable, but unallocated number ranges, or just use the numbering range of a local or international CP. In this case the only way to detect fraudulent traffic with high accuracy is to have visibility on whether the call was actually verified by the originator of the traffic.

Change: 4.23 There are other ways to prevent such calls with invalid or non dialable CLI reaching the called party. For example, CPs can prevent calls with invalid or non-dialable CLI or CLI that does not uniquely identify the caller from being connected to the called party by working with their upstream providers to ensure that any calls that are connected to their network have CLI Data that meets the requirements of GC C6.4.

AB Handshake comment:
Due to the complexity of the voice interconnect environment, working with upstream providers to arrive at a point where the true identity of the caller can be confirmed takes significant time and effort and is not always possible, especially in real time. In our view, the confirmation of the identity of the calling party should be a subject for communication directly between the call originating CP and terminating CP via an encrypted out-of-band channel.

Question 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?	*Is this response confidential? – Yes / No (delete as appropriate)*