Scams Consultations
Ofcom
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

Which? response to Ofcom consultation on *Improving the accuracy of Calling Line Identification (CLI) data*

Introduction

Which? welcomes the opportunity to respond to Ofcom's consultation on [Improving the accuracy of Calling Line Identification (CLI) data](#). Which? is supportive of Ofcom's efforts to reduce the number of scam phone calls, and thereby reduce the harm to consumers from scams. We agree that the proposals set out in this consultation could also help improve consumer confidence and trust in telephone services, provided the measures are implemented in a way that ensures the same protections are offered to all consumers. Below we set out Which?'s views on Ofcom's proposals in more detail.

Proposals to modify GC C6.6 and the case for CLI authentication

Spoofed phone numbers are a significant enabler of vishing scams, as the spoofed numbers can give scammers more legitimacy in the eyes of the recipients of the call and make the scams much more convincing. It's vital that the telecommunications industry works together to make it more difficult for scammers to use spoofing technologies. Which? is therefore supportive of Ofcom's proposals to modify General Condition C6.6 and associated guidance to require providers to identify and block calls with invalid or non-dialable CLI data, or where the CLI data does not uniquely identify the caller. We support Ofcom's aim to introduce the proposed modifications to GC C6.6 within six months of Ofcom publishing its statement in Autumn 2022, as consumers need protection from this route of scams as soon as possible.

While we support this consultation's proposals and aims, we also acknowledge that there will be some challenges and limitations to the proposals. In particular, we expect roaming mobile and UK call centres based abroad to pose some challenges to the proposed measures, as these are examples where UK presentation CLIs can be expected to appear for calls that originate overseas. Ofcom and industry should be transparent about how they will mitigate this challenge. We understand that industry is trying to find ways to manage this challenge while also blocking fraudulent calls from abroad that illegitimately spoof UK CLIs. We propose that there could be an opportunity to establish a process for UK businesses with overseas call centres to register their numbers so that telecommunications networks in the UK will know that a particular foreign network number and a particular UK display CLI can be expected to appear alongside each other. We would encourage Ofcom and industry to place the responsibility on the businesses to ensure their calls can get through, rather than put consumers at risk by having loopholes to manage the challenge of call centres based abroad that could also be abused by scammers.

The consultation states that '*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*'. This is a challenge the telecommunications industry will need to manage. Limited detail is provided on what the 'technically feasible steps' are, but we support that steps should be taken to verify authority to use phone numbers. If industry challenges the feasibility of these steps, it is vital that clear evidence is provided to support this challenge and that industry then works collaboratively and with Ofcom to find alternative solutions.

While we still support the objectives of the proposed measures, Ofcom states the proposed measures will not detect all spoof calls, which also strengthens the case for further measures on CLI authentication to work alongside these proposals. No single measure will be able to stop all scam calls, so it is important to put multiple blockers in the way of the scammers. We welcome Ofcom exploring the role of a call authentication system, such as STIR/SHAKEN. We would encourage Ofcom and industry to continue early work to identify the preparations required for implementation ahead of the call for inputs. Implementation of STIR/SHAKEN or a similar standard will not be sufficiently effective until a majority of calls have switched to Voice over IP, but it is vital that preparatory work begins as soon as possible so that the consumer protections from such a system can be achieved at the earliest possible time.

Do Not Originate

We support the proposal to include in the CLI guidance the expectation that transit and terminating providers use the Do Not Originate (DNO) list as part of efforts to identify and block spoofed calls. Ofcom states that 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. It is vital that all providers approach the identifying and blocking of scam calls in the same way to ensure all consumers have the same protections. We would welcome clarification from Ofcom on what it will do to ensure all providers are using the DNO list and how it will monitor the success of the proposed measures. We also understand that some providers might have limited capacity to manage the entire DNO list. Ofcom will need to ensure that all providers can manage the full list to ensure that consumers have the same protections from calls spoofing numbers on the DNO list, no matter which network the call is coming through.

We also support Ofcom's step to add information to its website about DNO and how to get in touch about adding numbers to the list, as we have previously highlighted the need for a clearer and easier process for businesses to sign up to DNO to protect their incoming numbers from spoofing.

Risk of blocking legitimate phone traffic

We acknowledge the risk Ofcom raises that some legitimate calls could be blocked due to the proposed measures. Ofcom has said it is difficult to assess the extent of the issue in advance, but expects the risk to be low. We therefore agree that it seems reasonable to implement the proposals as these measures will offer benefits and protections for

consumers. We encourage Ofcom to check how often blocking of legitimate traffic occurs through monitoring once the measures are implemented.

About Which?

Which? is the UK's consumer champion. As an organisation we're not for profit - a powerful force for good, here to make life simpler, fairer and safer for everyone. We're the independent consumer voice that provides impartial advice, investigates, holds businesses to account and works with policymakers to make change happen. We fund our work mainly through member subscriptions. We're not influenced by third parties – we never take advertising and we buy all the products that we test.

20 April 2022