



## **Tackling scam calls**

Updating our CLI Guidance to expect providers to block more calls with spoofed numbers

## **Virgin Media O2 response**

**28<sup>th</sup> March 2024**

**Non-Confidential response**

## EXECUTIVE SUMMARY

Virgin Media O2 welcomes the opportunity to respond to Ofcom's consultation regarding updating the current CLI guidance and further attempts to tackle scam calls.

Virgin Media O2 is committed to protecting our customers from fraud and scams as much as we are able to do so. We are continuously looking at ways in which we can support our customers, providing information via our website and direct communications in an attempt to update them on the tactics which may be used by scammers and provide advice on how such scams may be avoided. We are in the process of introducing new systems that will look to provide additional information and protections for customers in order to help them further identify who is contacting them. We have also fully implemented the HIYA solution in relation to Ofcom's DNO list, something which is blocking a large number of calls to our customers.

We recognise Ofcom is looking to further develop its CLI guidance following the previous changes made in 2023 and we are very much aware of the potential loophole Ofcom highlights within this consultation that may be exploited by scammers. As is clearly demonstrated within the consultation, the tactics used by scammers to exploit customers will continue to evolve and, as an industry, we must work to close down any loophole where technically possible. It is vital that customers have trust in their communication services and have confidence when answering calls. As the regulator, it is incumbent upon Ofcom to support both customers and providers in order to maintain trust and take steps to protect customers wherever possible.

The proposal to expand the current CLI guidance to include the expectation that providers '*identify and block calls from abroad that use a UK or non-geographic telephone number as a Presentation Number*' appears to be a logical step forward in tackling scam calls and, in principle, something we would look to support. However, as much as there is an obvious obligation on communications providers to take necessary action to protect, educate and support customers in dealing with scam calls, such responsibility must not fall solely onto the shoulders of providers. Both regulators and businesses also have a responsibility to consumers to take steps to target scam calls, be that through information provided to customers or additional security steps added to customer journeys.

Below we have provided our responses to the questions posed within the consultation and believe this fully outlines our current position.

### Questions

#### **Question 1: Do you have any views on the potential impact of the proposed change?**

In principle, VMO2 believe the proposed change would have a positive impact on consumers by reducing the number of scam calls they receive. From a technical perspective, the proposed change aligns with VMO2 current thinking regarding enhancing the blocking of both Presentation and Network numbers at international gateways.

However, our overall view is that the goal should always be to eventually achieve a position of having 'no exceptions', as any exception will quickly become known to spoofers/scammers with the numbers then becoming the target for continued spoofed call ingress. We are aware that in order to

achieve this goal, a solution for +447 must be defined and we note Ofcom states in the consultation that this is being at least considered.

**Question 2: Do you agree with our proposed change to Paragraph 4.19 of the CLI Guidance? If not, please explain why.**

Overall, VMO2 agree with the proposed update to the relevant wording within the CLI Guidance. However, we do believe there is scope for a slight change in the wording which better reflects modern networks. The terms of 'overseas' and 'UK' are no longer clear in modern networks, and it's believed that each of the scenarios need to be considered more in terms of how calls are transiting across networks in terms of 'national interconnects' and 'international interconnects'. Based upon this, we would recommend changing the proposed wording as follows:

4.19 As the CLI represents the origin of a call, calls from abroad should not use UK CLI as a Network Number or as a Presentation Number, except in a limited number of use cases.

To

4.19 As the CLI represents the origin of a call, calls from international networks should not use UK CLI as a Network Number or as a Presentation Number, except in a limited number of use cases.

**Question 3: Do you agree with the proposed implementation date of six months after the publication of the Statement? If not, please explain why.**

Although VMO2 agree with the proposed solution in principle, it is difficult to assess how long implementation would take with the information currently available. A full assessment of timeframes would depend on the full scope of any directive issued by Ofcom. Based upon that, we would request Ofcom remains flexible and works with providers to foster a pragmatic approach to implementation following the publication of any statement.

**Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?**

Overall, VMO2 agrees with the potential impact of this proposal on consumers, and we would expect it to result in a reduction of scam calls received by consumers, at least in the short term, as the current potential loophole is closed.

In terms of communication providers, we do agree that there will be impacts with regards to implementing the proposed change, in both costs and process changes. However, as stated above, it is difficult to accurately assess the impacts to providers before seeing any final requirements. Any potential changes could vary from configuration changes to the international gateways through to requiring vendors to enhance international gateway software.

VMO2 does not currently have a comment with regard to the proposal's impacts on business.

**Question 5: Do you agree with our assessment of the potential impact of our proposal on the Welsh language?**

VMO2 does not currently have a comment on this question.

**Virgin Media O2**

**March 2024**