

Dear Mobile Messaging team,

FCS response to Ofcom call for input: Reducing mobile messaging scams

The FCS represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. The FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

We have highlighted the call for input to our membership base, which is made up of wholesalers, small communication providers and resellers and have encouraged them to respond to you as they will have different experiences and perspectives on both the level of mobile messaging scams and the potential solutions set out in the call for input. However, we do have a couple of overarching comments that we would like to make.

1. We absolutely agree with Ofcom's position that mobile messaging scams need to be addressed. The impact on consumer and business customers and the overall industry is clear to be seen. The FCS believes that Ofcom and the industry need to do everything they can to increase the "trust in numbers" and so we support the focus Ofcom is putting in this area.
2. We also agree that Ofcom needs to work collaboratively with industry to address the issue. It is important that all parts of the industry have their voices heard and that solutions work for the complex supply chain as well as for vertically integrated mobile providers. Any potential solutions should be tested to ensure that they do indeed work for the complex supply chain. The FCS would be very willing to facilitate discussion with smaller providers/resellers if that would be helpful.
3. The FCS believes that the level and sophistication of scams reinforces the need for a Common Telephone Numbering Database (CDB). As Ofcom knows, NICC has already specified a CDB definition, but further work is required before implementation. The NICC Task Group is currently looking to develop an agreed UK process to ensure the data held by CPs is consistent. The FCS suggests that Ofcom re-looks at this workstream and considers how it could be used to help reduce the incident of telephone scamming.

The FCS is happy for this response to be included on the Ofcom website and can confirm that none of the response is confidential.

Please let me know if it would be helpful to discuss further and it would be helpful if you could confirm receipt.

Many thanks,
Stef

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