



Colt's response to Ofcom's consultation on: Improving the accuracy of Calling Line Identification (CLI) data

1. Summary

1.1. Colt welcomes the opportunity to respond to the Ofcom's consultation on: Improving the accuracy of Calling Line Identification (CLI) data (the "Consultation"). Colt provides world-class network and voice connectivity to businesses in the UK, Europe, Asia and the US.

1.2 The Consultation seeks views on the proposals to strengthen the rules and guidance for providers to identify and block calls with 'spoofed' numbers and reduce the harm from scam calls.

1.3 Colt supports the government's commitment to ensuring the future security of the telecoms market in the UK. This response sets out Colt's high-level views of some of the questions in the Consultation.

Q1. Do you agree with our proposed modification of General Condition C6.6? If not, please give reasons.

Colt agrees with the reasoning behind the modification of the GC6. The need to ensure a reduction in scam calls, and improved confidence in CLIs and trust in telephone services is paramount.

However, Colt wishes for Ofcom to provide more clarity in relation to the role of transit and terminating providers and to take into account operators like Colt, whose network architecture is perhaps very different to the network architecture of most operators within the UK telecoms industry.

Colt operates a truly global business, with a voice business in over 30 countries so Colt views the issues brought forward by this consultation from a global perspective. Our product lines, our network, our technology and our customers all have an international scope. This means our approach to nuisance calls and scams must take account of global best-practice in addition to specific initiatives in individual countries.

Q2. 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 provide reasons why a different date would be appropriate.

Considering Colt's business structure and network architecture, a deadline of six months after the Autumn statement is unlikely to be sufficient to implement the measures outlined. Colt would need a year to implement the relevant changes and would like to reiterate the need for Ofcom to take into consideration operators like Colt, whose network architecture is truly global.

Q4. 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?

Colt feels there is still ambiguity in regards to using 084/087 numbers for presentation. Colt believes there is a need for more clarity from Ofcom.

There are quite a few cases in the UK market where 0800 is used as a network CLI as the wording was not specifically clear in the past. The wording has now been changed to avoid confusion.

Colt feels the document needs more clarity to avoid any scope for honest/inadvertent misuse. Colt suggests an addition of a simple table with lead codes along the lines of:

	Type	Network	presentation
01/02	Geo	Yes	Yes
0800	FF	No	Yes
0845	SC	No	No
0847	SC	No	No
09	PR	No	No