Ofcom
Riverside House
2a Southwark Bridge Rd
London SE1 9HA
United Kingdom

Via email: scamsconsulations@ofcom.org.uk

20 April 2022

Re: Improving the accuracy of calling line identification (CLI) data

Dear Sir/Madam

I am writing to you today on behalf of Twilio Ireland Limited (**Twilio**) in response to Ofcom's consultation on changes to the General Condition and supporting guidance on the provision of CLI facilities (the consultation).

As a leading global Communications Platform as a Service (**CPaaS**) provider, Twilio provides services to more than 235,000 enterprises globally and powers more than 1 trillion interactions between them and their customers every year. Twilio's software allows enterprises to communicate with their customers over voice, SMS, messaging, video or email thanks to the communication features that enterprises have added into applications across a range of industries, from financial services and retail to healthcare and non-profits. In the United Kingdom, Twilio serves a number of global customers as well as a number of large UK organisations. Many of Twilio's customers are also small and medium-sized enterprises. Twilio's non-profit arm, Twilio.org, supports charitable organisations to deliver their communications needs.

Twilio is committed to ensuring trust in telephone numbers. As part of this commitment, Twilio sits on the board of the Alliance of Telecommunications Industry Solutions (**ATIS**) and co-chairs the Robocalling and Communication ID Spoofing Group, which has been coordinating work on the implementation of the STIR/SHAKEN protocol in the United States of America. As such Twilio welcomes Ofcom's confirmation in its accompanying statement that it plans to issue a call for inputs in Q4 2022 on CLI authentication and what would be required to implement the technology across industry. Twilio looks forward to contributing to this discussion based on its experience in the United States.

Twilio's main comment on the consultation relates to the CLI guidance and the requirement that calls from abroad using a UK CLI as a Network Number should be blocked except in the following limited circumstances:

- UK mobile users roaming overseas making calls back to UK numbers;
- Calls to a mobile user who is roaming in the UK;
- Where the traffic has originated on a UK network; or
- Where the traffic has originated from UK customers that are hosted on overseas nodes or cloud services.

Twilio fully supports these exceptions. As previously discussed with Ofcom there are a number of use cases where it is legitimate for calls to be coming from overseas with a UK number (*e.g.*, customer contact centre located overseas). In addition, Twilio notes that in its first consultation on the Future of Telephone Numbers Ofcom said of geographic numbers:

The Numbering Plan provides for some flexibility in geographic numbers, allowing them to be used "out of area" even outside of the UK. This is provided that the use meets the restrictions and requirements set out in the Numbering Plan. There are two provisos: the customer must have specified a number with that area code and the cost of calling the number must remain associated with a call to a number with that area code as if the call terminated in that area.

Twilio notes that Ofcom has retained the ability to use geographic numbers out of area provided that the two provisos are met in its recent statement Future of Telephone Numbers. As Ofcom has permitted the out of area use of geographic numbers, including outside of the UK, the rules associated with CLI must take this into consideration. As such the definition of a UK customer who is hosted on an overseas node or cloud services should not be narrowly defined but should mean any customer who is legitimately allocated a UK number.

Twillo fully supports Ofcom's proposal to include exceptions for cloud services in relation to CLI originating from abroad. Notwithstanding the same, Twilio would welcome further clarity on how the expectation will be applied in practice. In other words, how will an operator be able to distinguish between a UK CLI as a network number that is legitimately being used because it is coming from a cloud service and one that is not?

Whilst Twilio recognises that the CLI guidance refers to a resolution process and that such a resolution process should be handled in a timely fashion, Twilio urges Ofcom to adopt a more robust and detailed resolution process. This approach has been taken in Australia, for example in the CommsAlliance code on Reducing [Scam Calls and Scam SMS](), that has recently been out for public consultation. In particular, Twilio would welcome the addition of a section A2.7 in the CLI Guidance that would set out the requirements that must be included in a CPs dispute resolution process:

> A2.7   A CPs dispute resolution process must contain an electronic means to contact the CP notifying them that a party disputes the blocking. The CP must acknowledge receipt of the dispute within one (1) working day. The parties will consult in good faith to try to resolve the dispute within three (3) working days of receipt of dispute. In the event that the CLI is found to have been incorrectly blocked the CP must take action to unblock the CLI within two (2) working days.

Twilio would welcome the opportunity to discuss these matters further with you at your earliest convenience and provide you with any additional information you may require.

Yours sincerely,

Donald Connor

Donald Connor
Senior Director, Telecommunications Regulatory Compliance