# Your response

## Introduction

Tata Communications (UK) Ltd. ("TC UK"), together with its global affiliates ("TC companies"), provides international voice services, among other services, to wholesale and enterprise customers around the world. Fraud prevention is an integral service portfolio offered by TC UK and its global affiliates.

The TC companies have implemented the required STIR/SHAKEN framework elsewhere, along with implementation of other standards and processes designed to address illegal robocall activity. For example, the TC companies monitor traffic that has a display CLI that is different than the country of origin, and then analyze further by number of call attempts and average call duration as compared to standard call parameters. Deviations trigger alerts for further investigation. We have clear communications pathways with our TIER 1 partners and can quickly coordinate review and blocking requests. The TC companies stop more than 6 million fraudulent call attempts every month.

The TC companies have every reason and incentive to keep illegal robocalls and fraudulent traffic off the TC companies' network. The TC companies support reasonable, effective measures to address illegal robocalling.

| Question | Your response |
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| **Question 3.1: Do you agree with our analysis of the ways in which number spoofing is used, and the extent and types of harm associated with its use? If you have any further evidence which demonstrates the extent and types of harm involved, please provide this.** | *Is this response confidential? – Y / N (delete as appropriate)* |
| **Question 4.1: Do you agree with our assessment that while Ofcom rules and industry measures are likely to help to reduce scam calls, more needs to be done to tackle number spoofing? Provide reasons for your answer and include any suggested measures that could have a material impact on reducing the incidence of scam calls involving number spoofing.** | TC UK suggests that Ofcom should ensure that its analysis fully considers the efficacy of any proposed new requirements, including undertaking a thorough cost/benefit analysis.<br><br>TC UK recommends that Ofcom conduct a thorough analysis of how the implementation of STIR/SHAKEN, or any other means of addressing illegal robocalling, is the best approach given the circumstances in the United Kingdom.<br><br>For example, since STIR/SHAKEN addresses IP traffic, TC UK suggests that Ofcom should investigate if the traffic in the United Kingdom is in fact sufficiently IP in nature to warrant the STIR/SHAKEN framework.<br><br>Ofcom should also take into consideration the costs and complications of mandating a |

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| | number-spoofing mitigation framework in the United Kingdom, and particularly how much the framework will impose costs on communications providers which will in turn pass those costs through to end users in the United Kingdom.<br><br>TC UK suggests that such an analysis is required in order for Ofcom to determine the most effective and least costly method of preventing illegal robocalls and fraudulent traffic, in line with its statutory duties.<br><br>*Is this response confidential? – N (delete as appropriate)* |
| **Question 5.1: Is the approach to CLI authentication we have outlined feasible and workable?** | On the basis of Ofcom's consultation, TC UK believes that Ofcom does not yet have enough information to determine the feasibility and workability of any CLI authentication approach.<br><br>Results from deployment of STIR/SHAKEN in Canada and the United States are currently inconclusive.<br><br>Absent compelling evidence that STIR/SHAKEN actually reduces number-spoofing and fraudulent traffic, Ofcom should be wary of imposing costly and onerous industry-wide solutions with unknown effectiveness.<br><br>More targeted approaches, such as a call traceback regime, may prove to be as effective in addressing number-spoofing and fraudulent traffic at much lower cost.<br><br>*Is this response confidential? – N (delete as appropriate)* |
| **Question 5.2: To what extent could adopting this approach to CLI authentication have a material impact on reducing scams and other unwanted calls? If you consider an alternative approach would be better, please outline this and your reasons why.** | *Is this response confidential? – Y / N (delete as appropriate)* |
| **Question 5.3: Are there additional measures that could be adopted to further strengthen** | *Is this response confidential? – Y / N (delete as appropriate)* |

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| **the suggested approach and/or minimise the identified exemptions?** | |
| **Question 6.1: Do you agree with the approach outlined for the monitoring and enforcement of the rules with regard to CLI authentication? Are there any alternative approaches that we should consider?** | *Is this response confidential? – Y / N (delete as appropriate)* |
| **Question 6.2: Do you agree that CLI authentication could make call tracing easier and yield benefits in terms of detecting scammers and nuisance callers?** | *Is this response confidential? – Y / N (delete as appropriate)* |
| **Question 7.1: What are your views on the timescales for the potential implementation of CLI authentication, including the interdependencies with legacy network retirement?** | TC UK suggests that Ofcom should consider the timescale of deployment of STIR/SHAKEN in Canada and the United States before imposing any timeline on deployment of a CLI authentication program in the UK.<br><br>Ofcom can expect a comparable rate of deployment in the UK assuming comparable levels of legacy network equipment, with corresponding levels of effectiveness.<br><br>*Is this response confidential? – N (delete as appropriate)* |
| **Question 7.2: Do you agree with our assessment of the administrative steps required to implement CLI authentication and how these should be achieved?** | *Is this response confidential? – Y / N (delete as appropriate)* |
| **Question 7.3: Should a common numbering database be implemented to support the CLI authentication approach? Please provide any comments on the steps needed to implement a common numbering database, including on the feasibility of the industry leading on (a) the specification; and (b) the implementation?** | *Is this response confidential? – Y / N (delete as appropriate)* |

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| **Question 8.1: Do you agree with the proposed framework for impact assessment and the potential categories of costs and benefits? Please identify any other factors that we should take into account in our assessment.** | *Is this response confidential? – Y / N (delete as appropriate)* |

Please complete this form in full and return to: **CLIauthentication@ofcom.org.uk**