BT Group Response

Tackling scam calls – expecting providers to block more calls with spoofed numbers

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BT Group

1. Introduction

1.1 BT welcomes the opportunity to respond to Ofcom's consultation "*Tackling scam calls – expecting providers to block more calls with spoofed numbers.*" We support Ofcom's proposal to extend the existing Calling Line Identification (CLI) Guidance the include the blocking of international calls using UK presentation numbers, as well as network numbers.

1.2 As noted in BT Group's June 2023 [response](#) to Ofcom's Consultation *Calling Line Identification (CLI) authentication – a potential approach to detecting and blocking spoofed numbers*, we agree that introducing a new CLI authentication system is not appropriate at this time on grounds of proportionality, given that alternative solutions – including the one proposed by Ofcom – are likely to have a greater impact on end user experience at a much lower cost.

1.3 BT has already taken substantive steps in recent years to protect end users from fraud which exploits the ubiquity of our network, in line with our [manifesto](#) commitment to "become the world's most trusted connector of people, devices, and machines". These steps have included:

- Rollout of a new SMS anti-spam filter which has blocked more than 285m scam texts, leading to an 85% overall reduction in EE customers reporting spam messages to us;

- Adopting innovative approaches to combat particularly prevalent examples of spam, such as introducing new filters to reduce the volume of 'Mum & Dad' SMS spam messages by 70%;

- Becoming one of the first providers in the UK to start blocking UK network and presentation numbers coming from overseas at our international gateways[1].

1.4 Our efforts to date notwithstanding, we recognize that some scams traffic continues to circumvent our protections and reach end users. As noted in the June 2023 response, delivering end-to-end solutions to prevent scams from occurring requires *all* providers, alongside stakeholders from businesses, civil society, government, and a range of regulators - to take steps to ensure that communications ecosystems are safe and secure.

1.5 In telecommunications, a major part of this is ensuring that all participating communications providers (CPs) comply with minimum baseline standards set by the regulator. We therefore welcome introduction of Ofcom's monitoring and enforcement regime announced alongside the consultation document on updating the existing CLI Guidance.

1.6 The rest of this document is structured as follows:

- We set out our experience of blocking at international gateways and our expectations around its impact;

- We note our support for minor changes to the draft Guidelines to align with future industry documents;

- We detail our agreement with Ofcom's proposal to focus future interventions on international cooperation and delivery of a call tracing solution.

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[1] Other than in the specific circumstances set out by NICC document [ND 1447](#)

2. BT has been blocking UK presentation numbers since July 2022

2.1 As part of our efforts to ensure end users can benefit from the best possible protection, BT already blocks traffic falling at our international gateways within the definitions proposed by Ofcom in the consultation – i.e., international calls with a UK presentation number that do not fall within the exceptions envisaged by NICC standard ND 1447.

2.2 When BT first started blocking UK presentation numbers at the international gateway, the impact was immediate and significant - in the first month, for example, up to one million calls per day were prevented from entering our network. We expect that other providers in the ecosystem will see a similar impact (relative to their overall call volumes) should Ofcom introduce changes to the draft Guidance as set out in the consultation.

3. Ofcom should make drafting amendments to the updated Guidelines to define 'UK networks'

3.1 Ofcom should clearly define in the Guidelines when an overseas or cloud-hosted node falls within the scope of General Condition 6 to ensure there is no misunderstanding around intent. The lack of a common definition of "UK networks," "networks outside the UK" and "abroad" – when taken alongside the exceptions set out by Ofcom – might lead to some misunderstanding/misrepresentation of when calls originating outside the UK should be blocked.

3.2 We understand the UK telecommunications industry standards body – the NICC – has been considering proposals of clarificatory language in the Ofcom CLI Guidance in relation to blocking of international calls with UK CLI. As a principle, we support the inclusion of clarificatory language in the updated Guidelines.

4. We agree that Ofcom is correct to focus next steps on call tracing and international co-operation

4.1 We are grateful to Ofcom for setting out its likely future areas of focus in its *Calling Line Identification (CLI) authentication assessment and future roadmap.* Given the importance of finding common, industry-wide solutions to prevent the end user impact from scams, we believe that it is essential for communications providers to have a clear pathway on future activities. With this in mind, we agree that Ofcom should focus its future work in this area on the five areas set out.

Consultation response form

Your response

Question	Your response
Consultation question 1: Do you have any views on the potential impact of the proposed change?	Yes – see section 2 above
Consultation question 2: Do you agree with our proposed change to Paragraph 4.19 of the CLI Guidance? If not, please explain why.	Yes
Consultation question 3: Do you agree with proposed implementation date of six months after the publication of the Statement? If not, please explain why.	Yes
Consultation question 4: Do you agree with our assessment of the potential impact on specific groups of persons?	Yes
Consultation question 5: Do you agree with our assessment of the potential impact of our proposal on the Welsh language?	Yes