

Your response

Question	Your response
<p>Consultation question 1: Do you have any views on the potential impact of the proposed change?</p>	<ol style="list-style-type: none"><li data-bbox="730 297 1445 730">1. There is a clear desire by our membership to 'do the right thing' in terms of taking all reasonable steps towards eradicating scam calls. The issue has been a long-term blight on our industry and any legitimate service provider will have seen the consequences of this type of activity. From the wider view of declining usage, a growing lack of trust in using the telephone, through to the more personal impact on individuals who suffer as a result of successful scam attempts, there is a genuine desire to collaborate and stamp out this behaviour.<li data-bbox="730 779 1445 1133">2. However, any steps we take do need to be balanced with technical and commercial capabilities as well impact. Whilst the desire is widely felt, the ability to implement the suggested changes create a different challenge for each of our members. Particularly depending on where you sit in the value chain, the impact could be disproportionately large. This needs to be considered when factoring in any implementation plan.<li data-bbox="730 1182 1445 1711">3. Whilst we can agree that the potential impact on the ability to make scam calls that have the appearance of being genuine and originating in the UK will be greatly diminished if the proposed guidance is adopted; some members are faced with technical challenges that could result in the loss of legitimate business, or worse, the inadvertent blocking of genuine calls. In addition, the proposed work arounds to enable legitimate business cases to continue will come at a cost that will need to be born by either the end customer or the service provider. This will likely disproportionately impact small business and those using cloud services which, by default, will need to implement special measures to continue providing these services and still comply with GC C6.

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<p>Consultation question 2: Do you agree with our proposed change to Paragraph 4.19 of the CLI Guidance? If not, please explain why.</p>	<p>1. In so far as the wording achieves Ofcom’s overall aim; to ensure that UK networks block calls that include any kind of UK CLI when the call is originated outside of the UK, we agree with the proposed change.</p>
<p>Consultation question 3: Do you agree with proposed implementation date of six months after the publication of the Statement? If not, please explain why.</p>	<p>1.</p> <p>For many of our members the proposed implementation timeline is too short. Our industry is currently working through a number of major projects right now, such as One Touch Switching, PSTN Switch off and TSR implementation, all of which have hard deadlines. This load on service providers, not to mention the entire value chain, is excessive and to add further requirements at relatively short notice will place additional burden on these organisations. Therefore, we feel a minimum of 12 months would be more reasonable.</p> <p>2. Ofcom recognise in the consultation that some providers will incur costs and these are likely to be passed on to business customers. It is noted that the benefits should outweigh the cost and we would ask that Ofcom make the research available, which established the likely cost and impact, particularly on cloud providers. We note that BT have reported their voluntary implementation and impact but it would be unreasonable to expect the costs and outcomes of the BT experience to correlate directly to our membership, which is predominantly made up of smaller providers with established IP based networks.</p>
<p>Consultation question 4: Do you agree with our assessment of the potential impact on specific groups of persons?</p>	
<p>Consultation question 5: Do you agree with our assessment of the potential impact of our proposal on the Welsh language?</p>	