

Your response

Question	Your response
<p>Consultation question 1: Do you have any views on the potential impact of the proposed change?</p>	<p>The FCS welcomes the focus on scam calls and agrees that it is in the interests of consumers, business customers and the industry, to address the issue. It is important that customers have confidence in answering telephone calls and that the industry addresses areas exploited by scammers.</p> <p>The FCS believes that it is important to understand the impact on all providers in the marketplace. The changes will affect cloud/SIP providers and transit carriers more than the traditional networks, who are more easily able to implement the proposed remedy. It would be helpful for Ofcom to give greater consideration to alternative voice solutions, such as the cloud, when making policy. The FCS is very happy to provide any insights from our members at any time, if helpful to Ofcom.</p> <p>The FCS believes that the Common Telephone Numbering Database (CDB) could aid compliance and reduce scam calls, and suggests that Ofcom reviews its approach to the CDB. As Ofcom knows, NICC has already specified a CDB definition, but further work is required before implementation. The NICC Task Group is currently looking to develop an agreed UK process to ensure the data held by CPs is consistent, which will have a positive impact on the ongoing fight against scammers.</p> <p>We also believe that Ofcom should promote more best practice in this area as scammers are likely to look for other areas to exploit. Ofcom should be working collaboratively with industry to understand the impact of scams and regulation in an All-IP world.</p>
<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>The changes to Paragraph 4.19 are straightforward and reflect Ofcom's aims.</p>

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<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>Whilst some providers have already implemented CLI presentation blocking, it does not mean that it is straightforward for all types of providers, particularly cloud providers.</p> <p>Enterprise customers may have to organise different routing into the UK, as they did for network CLI blocking, and some FCS members have said that this may require longer than the six months implementation period Ofcom is suggesting.</p>
<p>Consultation question 4: Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p>Yes</p>
<p>Consultation question 5: Do you agree with our assessment of the potential impact of our proposal on the Welsh language?</p>	<p>Yes</p>

Please complete this form in full and return to scamsconsultations@ofcom.org.uk.