

4th March 2024

Response to “Tackling scam calls”

Magrathea welcomes the opportunity to respond to this consultation which is another part of the ongoing work Ofcom are doing to tackle scam and nuisance calls. As mentioned in previous responses, we are already an active participant in the NICC CLI Task Group and have engaged with Ofcom, ICO and Trading Standards regularly to discuss this area of work.

We were pleased to receive the ‘CLI authentication assessment and future roadmap’ which was released along with this consultation and wholly agree with the conclusion reached. With a clear focus on using and improving existing tools, processes and procedures - alongside monitoring and enforcement – we agree that industry should be able to make ongoing progress with proportionate levels of cost and disruption.

Response to consultation questions

Consultation question 1:

Do you have any views on the potential impact of the proposed change?

Consultation question 2:

Do you agree with our proposed change to Paragraph 4.19 of the CLI Guidance? If not, please explain why.

Consultation question 3:

Do you agree with proposed implementation date of six months after the publication of the Statement? If not, please explain why.

Magrathea are in support of the changes generally and acknowledge the significant amount of work done by the NICC CLI Task Group to explore legitimate use cases that will be impacted by the proposed changes to CLI blocking measures.

This work, along with the proposed guidance for implementation of CLI blocking measures, appears to satisfy most scenarios that could potentially cause concerns for our clients. The exceptions will serve to ensure we don’t prevent the variety of valid scenarios that currently support international trade and cross border flexibility to a number of communication providers.

With exceptions in place to support services such as cloud hosting and international call centres working on behalf of UK business, we do not foresee any major challenges to implementation. In fact, much of the preparatory work was carried out for network CLI blocking in 2023, so we believe the proposed implementation date of six months post Statement seems reasonable.

We would like to take this opportunity to reiterate our previous views that the introduction of a common numbering database (CDB) would go a long way to improving what tools we can use in relation to number management and CLI handling. This, combined with general improvements in data management, should bring about some improvements in how industry manage bad actors and share information.

Magrathea is also championing a new initiative, raised in February 2023 with the ICO, whereby carrier networks could utilise Telephone Preference Service (TPS) data to retrospectively monitor service provider traffic, enabling rapid investigation of potential bad behaviour. Again, not something that will solve the problems by itself, but would be another tool in the box of things that would help give more control to industry to manage this problem. It is now apparent that regulatory and government support will be required to bring about the changes needed to allow the ICO to support this initiative.

We remain available to discuss any of these points further if Ofcom should wish to do so.

Yours faithfully,

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✂Magrathea Telecommunications Ltd