NICC welcomes the opportunity to comment on Ofcom's proposals for greater blocking of nuisance calls. We agree with the change to extend blocking to be based upon Presentation Number CLIs and will make the necessary changes to ND1447. However, we believe that the Guidance would benefit from further clarification as follows -

NICC considers that the guidelines, in particular 4.19 (and related clauses), are currently open to interpretations which could provide opportunities for scam calling from abroad using spoofed UK numbers.
The ambiguity arises from the use of terms like "UK network" (4.16, 5.4), "networks outside the UK" (4.16) and "abroad" (4.19, 5.4) without precise definitions which take account of the distinction between domestic and international interconnects.

Our proposed changes are as follows -

Add the following to the table in Glossary:

UK Network	the UK public voice network comprised of all interconnected UK PECNs.
Domestic interconnect	the interconnect arrangement between UK PECNs.
International interconnect	the interconnect arrangement between a UK PECN and a non-UK network.

Amend the text of clause 4.19 as shown by the following marked-up text:

4.19   As the CLI represents the origin of a call, calls from an international interconnect~~abroad~~ should not use UK CLI as a Network Number, except in a limited number of use cases:

- UK mobile users roaming overseas making calls back to UK numbers, i.e. calls with a CLI from the +447 range;
- calls from a UK PECN to a non-UK mobile user who is roaming in the UK;[21]
- where the traffic has originated on a UK network (but only if the ingress UK PECN has reliable means to distinguish this traffic from calls with spoofed UK CLI)~~; or~~
- ~~where the traffic has originated from UK customers that are hosted on overseas nodes or cloud services.~~

Except in these use cases, calls from abroad using UK CLI should be blocked.[22]

Note – a CP which uses overseas nodes or cloud services for the provision of services to UK customers is considered a UK PECN (with the corresponding obligations) and does not constitute an exception under this clause.