UKCTA

Tackling scam calls
UKCTA Response to the Consultation
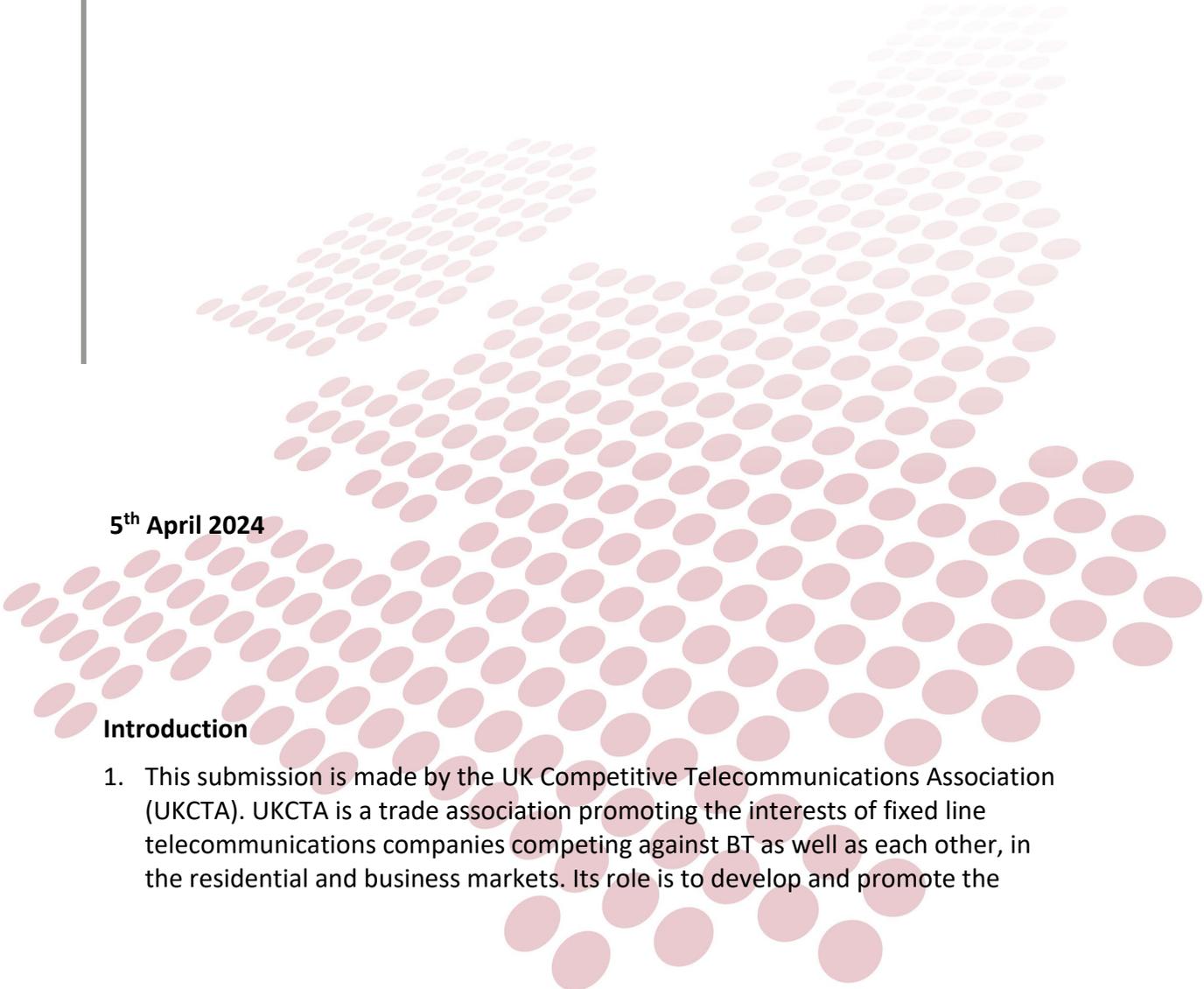
5th April 2024

Introduction

1. This submission is made by the UK Competitive Telecommunications Association (UKCTA). UKCTA is a trade association promoting the interests of fixed line telecommunications companies competing against BT as well as each other, in the residential and business markets. Its role is to develop and promote the

interest of its members to Ofcom and the Government. Details of membership can be found at www.ukcta.org.uk. Its members serve millions of UK consumers.

CLI future roadmap

2. We welcome the opportunity to respond to this consultation. UKCTA members are very supportive of the CLI future roadmap published by Ofcom. Overall, we believe the gradual approach proposed by Ofcom is sensible and will allow Ofcom and the industry to develop effective solutions against number spoofing.
3. UKCTA advocated for such an approach to regulatory interventions in its response to Ofcom Consultation in June 2023, inviting Ofcom to evaluate the effects of existing measures before moving to any further measures such as CLI authentication.
4. UKCTA strongly supports Ofcom's proposal to explore enhanced call tracing solutions in order to identify and tackle fraudulent calls at the source and we would suggest looking at successful examples such as the U.S. Industry Traceback Group, tracebacks.org.
5. UKCTA welcomes the phased approach to blocking international calls with a national mobile CLI. The design and implementation of such an intervention has proven to be complex and challenging in other countries, and we are pleased to note that Ofcom will take the time necessary to identify the different options to ensure legitimate roaming calls are not being impacted by any potential interventions.

Plan for CPs

6. UKCTA members support plans to update CLI Guidance to expect providers to block more calls with spoofed numbers.
7. Scam calls are a difficult issue and can have a detrimental impact on consumers and their trust in the industry. It is good to see that this issue has the much-needed support of Ofcom. UKCTA members are keen to proactively block bad traffic and bad actors.
8. It is appreciated that Ofcom has considered industry views and has chosen not to implement the STIR/SHAKEN method. The Ofcom proposal is a more effective, feasible and technically achievable alternative.
9. UKCTA members will work on implementing this solution and hope to meet Ofcom's 6-month deadline.

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Impact on businesses

10. Whilst this is an effective solution that can be implemented by CPs, it has far greater knock-on effects for business users that need to be considered. This will effectively block scam calls but, will also block many legitimate business calls.

11. There is a short three paragraph section[1] within the impact assessment that address the impact on business and suggests this solution may result small 'incremental costs' for businesses. We think there could be a much greater impact. We believe that further consideration to the possible costs to business customers and how that may shape market competition and the business landscape for those businesses who use calling services from abroad.

12. Many businesses use non-UK based call centres that present as UK based numbers, blocking these could cause an issue within businesses and for the competitive market who use this business strategy. There is huge complexity in this market and changing this guidance could be a huge cost ultimately to the end consumer. Analysis and a deeper understanding of the market and the possible businesses affected is required in order to fully understand the possible effects of these changes. To ensure this does not have an adverse and costly effect on those businesses Ofcom needs to widen the communication programme and request information from those businesses who will be most affected by this change.

13. CPs will warn their customers as soon as possible that this will be implemented but, many businesses may need to change their business models or adapt in other ways. Ofcom needs to gather more information on this in order to proactively minimise adverse effects.

Conclusion

14. Scam calls are a key issue for the industry and UKCTA appreciates Ofcom's focus on this and interaction with industry. We look forward to implementing measures to help protect consumers from calls with spoofed numbers. UKCTA agrees this is an effective solution but, are conscious of to ensuring business customers have been considered and will not be adversely affected.

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[1] Paragraph 3.25-3.27, page 14-15, further-action-scam-calls-consultation.pdf (ofcom.org.uk)