ITSPA

Business Switching and Cyber Security Task Force Strategies

Introduction

ITSPA has set up two task forces to focus on the most significant campaigns of current relevance to ITSPA members, namely business switching (porting) problems and tackling cyber crime (telephony fraud). These groups have been progressing well during the first four months of 2017 but there was agreement at Council that a more concrete strategy would be helpful in delivering the necessary outputs to help make progress in achieving the campaign objectives. This strategy paper intends to provide the direction for both task forces for the remainder of 2017 .

Political Intelligence

The objectives and desired outcomes

Business Switching Task Force

The long term objective: *To reform the current system of fixed line switching that enables a truly competitive market for businesses to change voice providers quickly and smoothly*

Three strands to achieving this objective:
- Resolving Service Establishment issues
- Resolving Order issues
- Finding a long term resolution to achieve direct routeing

Desired short term outcome: *The development of clear Ofcom guidance around GC18 that provides industry with requirements to achieve business switching in a suitable timeframe that is comparable to the mobile market*

Desired long term outcome: *To be determined as campaign evolves in discussion with industry*

The objectives and desired outcomes

Cyber Crime Task Force

The long term objective: *To reduce instances of cyber crime and telephony fraud in the digital and traditional communications market*

Three strands to achieving this objective:
- Educating law enforcement and wider society on the risks and mode of compromising devices
- Influencing government policy in relation to the proceeds of the crime (outpayments)
- Hardening infrastructure as well as improving coordination and contingency planning

Desired short/medium term outcome: *To have dedicated unit within the National Crime Agency that is effectively funded and resourced to tackle telephony fraud.*

Desired long term outcome: *To influence the UK Government to raise the issue of outpayments with the ITU*

Political Intelligence

Business Switching

Business Switching – Campaign tactics

In order to be successful in the campaign, various tactics need to be employed to be effective. The following strands of activity need to be undertaken and coordinated.

Collation of Evidence

This is central to the campaign and necessary to back up the various arguments that take place. This needs to take place in two forms:

- A survey of members and the wider industry outlining the various examples and problems that the industry is experiencing. This has been drafted and will be circulated to members initially, before being extended to the industry more widely.
- Written submissions providing more detail of the various type of switching/number porting problems that take place

Complaint Guidance and Support

ITSPA will support members in submitting formal complaints to Ofcom as a means to making the regulator take notice of the problems facing the industry and to potentially force its hand.

Template Section 96A Complaints: These templates are being developed by members of the industry developments group around the specific issues that members are experiencing and can then be submitted to Ofcom.

Section 185 (1A) complaints: ITSPA will provide legal advice to members who wish to undertake Section 185 (1A) complaints.

<u>Stakeholder Engagement</u>

ITSPA should undertake engagement opportunities in two phases:

- **Regulatory + Industry:** In the short term ITSPA should continue to explore any possible avenues with Ofcom to change their minds and to review this policy area. This would be through a combination of one to one meetings and also being involved in specific industry forums such as the OTA Number Port Executive Steering Group and IP Exchange Forum. It will be important for relevant ITSPA stakeholders to report back on developments to the Task Force to gauge an understanding on progress.

- **Political + Media Engagement:** Secondly, it should build a network of potential allies to help build necessary pressure, should ITSPA decide to implement a more aggressive campaign in this area. Stakeholders would include MPs, Peers, journalists and wider organisations (like the FSB). ITSPA should undertake a meeting programme during the summer to develop and strengthen relations for future activity in the autumn.
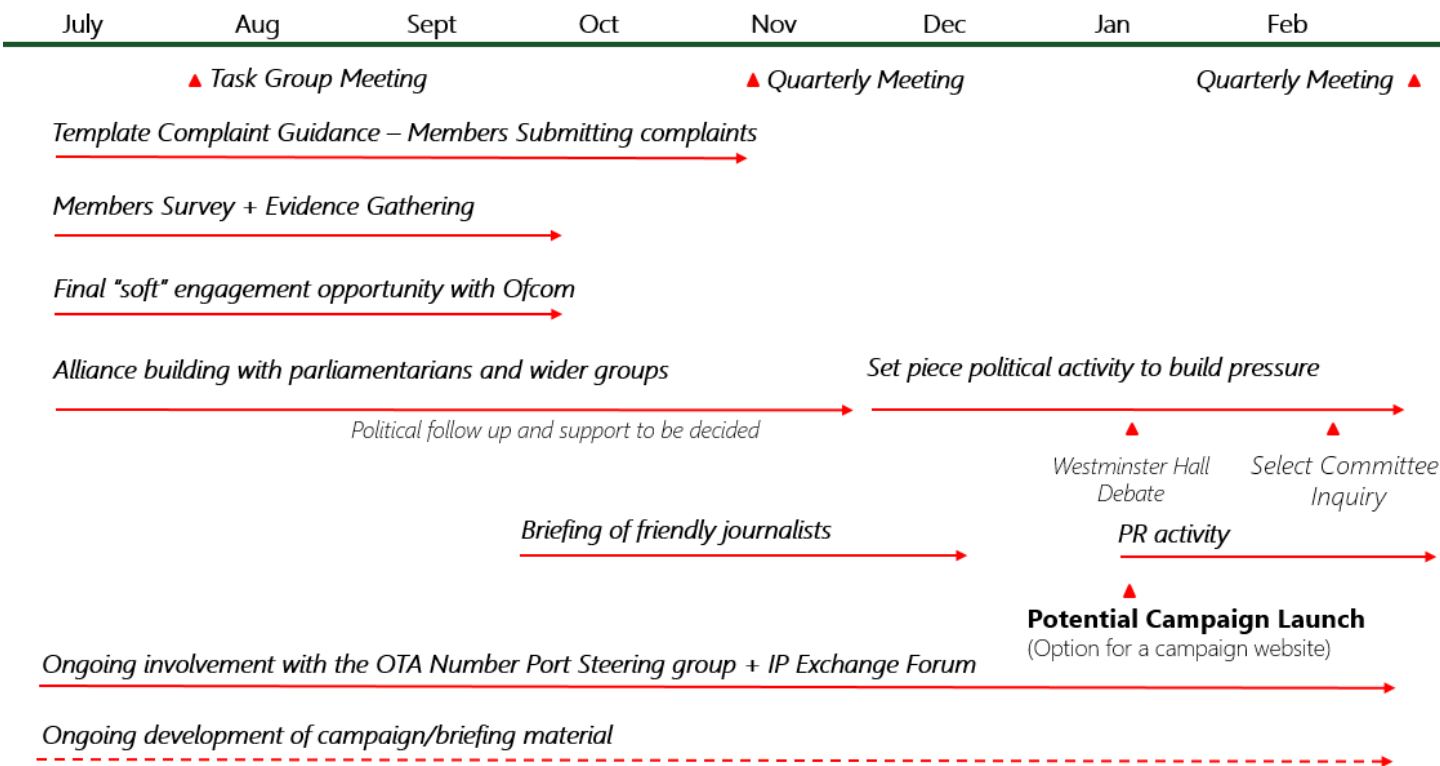
Business Switching – Campaign Activity

It appears that, given recent correspondence, Ofcom are unlikely to change their current thinking, insisting this is an issue for the industry to resolve. Once relationships have been developed, ITSPA should consider a number of tactics to build pressure on Ofcom to reconsider this position. This would sit alongside various complaints submitted by ITSPA members.

Campaign activity could include:

- Letters from parliamentarians to the DCMS and Sharon White at Ofcom
- A one off inquiry by the Culture Media and Sport Select Committee or the House of Lords Communications Committee
- Evidence for questioning at Ofcom's regular Culture Media and Sport Select Committee sessions
- Regular parliamentary questions
- A Westminster Hall debate on the issue
- Template email/letter to local MPs and/or Sharon White by frustrated businesses/business groupings and consumers
- Media coverage in trade press and (if possible) national media
- Event or Media stunt aligned with partners to promote the problem
- Campaign Website + material to help spread the message

Business Switching - Possible Timeline

July	Aug	Sept	Oct	Nov	Dec	Jan	Feb

▲ Task Group Meeting   ▲ Quarterly Meeting   Quarterly Meeting ▲

Template Complaint Guidance – Members Submitting complaints →

Members Survey + Evidence Gathering →

Final "soft" engagement opportunity with Ofcom →

Alliance building with parliamentarians and wider groups →   Set piece political activity to build pressure →

Political follow up and support to be decided

▲ Westminster Hall Debate   ▲ Select Committee Inquiry

Briefing of friendly journalists →   PR activity

▲

Potential Campaign Launch
(Option for a campaign website)

Ongoing involvement with the OTA Number Port Steering group + IP Exchange Forum →

Ongoing development of campaign/briefing material - - - →

Cyber Crime

Cyber Crime – Campaign tactics

The following strands of activity would be required to achieve the necessary outcomes to help achieve this task force objective.

Political + Regulatory and Media Engagement

ITSPA should continue to develop links with Government, Ofcom and law enforcement to help pursue its agenda in this area.

- **Government:** Cyber Security and Fraud is now a major issue but the key would be to raise telephony fraud higher up the agenda. There are many stakeholders (the Home Office, the Cabinet Office, the NCSC) to engage with and lobby for greater funding, improved domestic coordination and greater international cooperation..
- **Ofcom:** In recent correspondence surrounding the use of its current powers, Ofcom have expressed an interest to meet and so ITSPA should follow this up and develop strong links in this area.
- **Parliament:** ITSPA should build support within Parliament to hold both Government and Ofcom to account, should progress not be forthcoming.
- **Law Enforcement:** ITSPA have developed good links with certain elements of law enforcement but more needs to be done to coordinate communication across the various organisations involved including ACPO, Action Fraud and the NCA.
- **The Media:** This issue is again ripe for interested journalists and ITSPA should consider using it as a means to help raise the profile of the issue and build impetus for policymakers to take action.

Fraud Dossier

In conjunction with a recent survey from an ITSPA member along with research from Cavell Group, a fraud dossier will be produced to provide useful collateral when engaging with stakeholders.

Fraud Video

In collaboration with law enforcement stakeholders there has been agreement to develop a telephony fraud video to help promote awareness and educate police forces across the country.
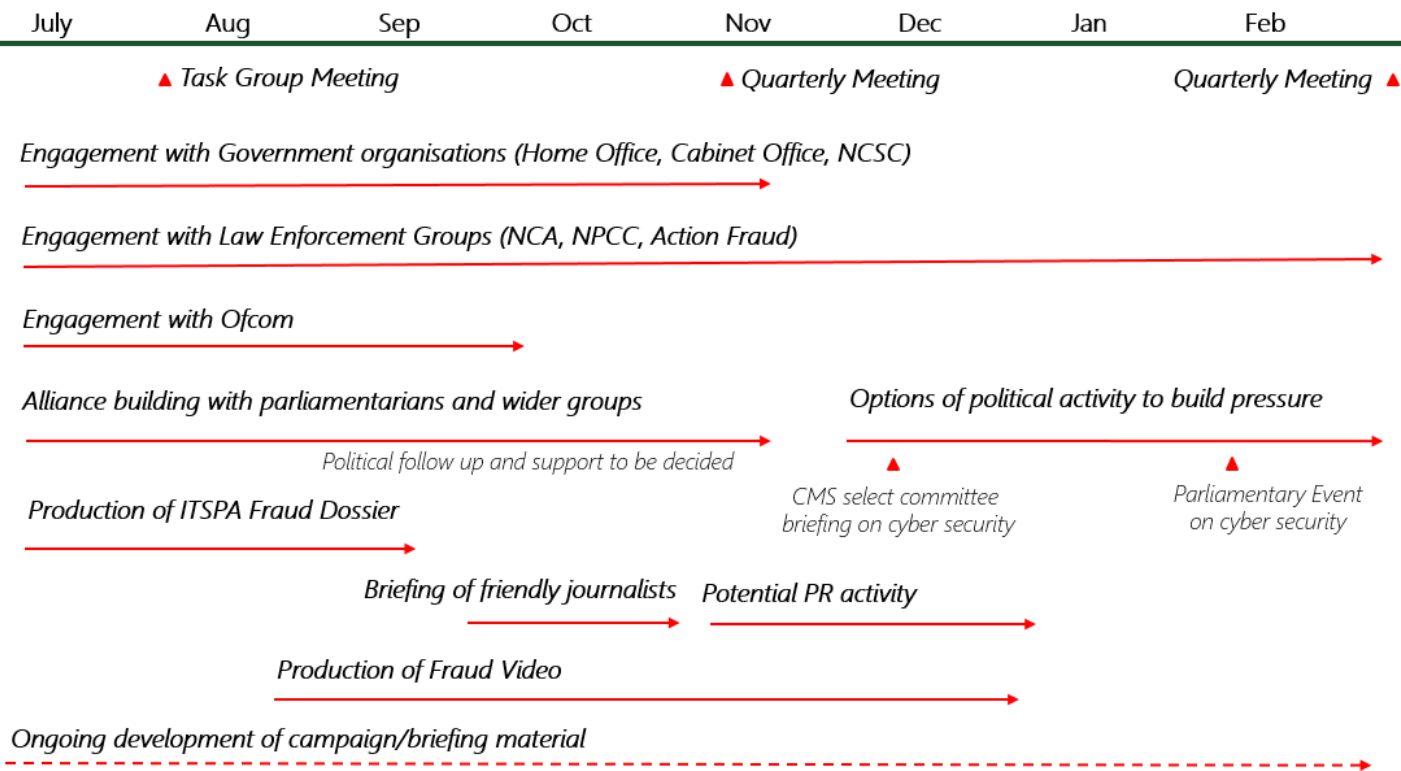
Cyber Crime – Campaign Activity

Similar activity to that of the business switching campaign could be employed for the cyber security campaign if deemed necessary by ITSPA, to help raise awareness and build momentum around necessary change should engagement activity with stakeholders not produce the necessary outcomes.

Campaign activity could include:

- Media coverage in trade press and (if possible) national media focussed around the ITSPA fraud dossier.
- Select Committee visit to an ITSPA member to help promote awareness around how ITSPs tackle telephony fraud.
- A select committee inquiry into the issues of cyber security with an element focussed on telephony fraud.
- A Westminster Hall debate into the challenges faced in tackling telephony fraud.
- Political questions around current policy and future progress.
- Promotion of the Fraud video at a Cyber Security event hosted in Parliament

Cyber Security – Possible Timeline

July	Aug	Sep	Oct	Nov	Dec	Jan	Feb

▲ Task Group Meeting   ▲ Quarterly Meeting   Quarterly Meeting ▲

Engagement with Government organisations (Home Office, Cabinet Office, NCSC)

Engagement with Law Enforcement Groups (NCA, NPCC, Action Fraud)

Engagement with Ofcom

Alliance building with parliamentarians and wider groups

Options of political activity to build pressure

Political follow up and support to be decided

CMS select committee briefing on cyber security ▲

Parliamentary Event on cyber security ▲

Production of ITSPA Fraud Dossier

Briefing of friendly journalists   Potential PR activity

Production of Fraud Video

Ongoing development of campaign/briefing material

Political Intelligence

Secretariat Resource + Budget

Mindful of the previous ITSPA campaign undertaken on net neutrality, the Directors felt it would be sensible to consider potential extra Secretariat costs based on the amount of time required to undertake the campaign. Political Intelligence would propose the following arrangement in the initial first 6 months to ensure resource can be effectively allocated to the Task Force work if required.

1) Agreement by Council that £12,000 of ITSPA funds be allocated for potential use over the next 6 months should more of Political Intelligence's time be required to undertake the Task Group activities along with its other Secretariat functions.

2) Political Intelligence would suggest ring fencing £3,000 of the current monthly retainer (£9,000) for the next 6 months specifically around Task Force Activity. This would be split between £2000 per month on Business Switching and £1000 per month on Cyber Security.

3) Should Political Intelligence's time on the Task Forces exceed the £3,000 mark during a monthly period, the Directors could use part of the additional fund to continue activity. This fund would only be used if i) the budget allocated for both Task Forces has been used up and ii) if there was no time left allocated within the wider ITSPA retainer. Political Intelligence would suggest that a maximum of £3,000 per month should allocated within the initial 6 month period. A few examples are set out below:

Month	Biz Switching	Cyber-Security	Remaining ITSPA Retainer	Fund Allocation
August	£1500	£1000	£6500	£0
September	£2500	£500	£6000	£0 (Extra allocated from Cyber pot)
October	£3000	£1500	£6000	£1500
November	£4000	£1500	£6000	£2500
December	£2000	£1500	£5000	£0 (Extra allocated from retainer pot)

Political Intelligence

Next Steps

Political Intelligence would recommend a combined Task Force meeting towards the end of July to agree:

- Clarify short/medium term campaign outcomes
- Agree campaign activity and timescales
- Clarify campaign leads and resource
- Agree Political Intelligence budget – for Council approval
- Consider any other optional budgets – for Council approval

Political Intelligence