

Caller Line Identity (CLI) Guidance for Comms Council UK members

About Comms Council UK

Comms Council UK is a membership-led organisation that both represents and supports telecommunications companies that provide services to both business and residential customers in the UK. We keep Britain talking in its various guises by providing or reselling voice services over data networks (VoIP) as well as other “over the top” applications including instant messaging and video.

The membership is a mixture of network operators, service providers, resellers, suppliers and consultants involved in a sector that is diversifying rapidly.

Comms Council UK (formerly known as ITSPA) represents its members at a policy level, builds coalitions to collaborate on industry initiatives and provides a platform to help members prepare for change, learn about new trends and develop new business relationships.

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Introduction

The ultimate aim is to reduce the volume of unwanted nuisance or fraudulent calls received by UK consumers and businesses. The following interpretation of Ofcom’s guidance should be considered with this aim in mind so far as it is technically and economically feasible.

Calls to emergency services should never be blocked due to missing or malformed CLI, Ofcom and industry agree that ensuring emergency calls reach the emergency handling authority every time takes priority over validating data passed with a call, however, communications providers should note that compliance with their location information regulatory obligations currently rely on CLI integrity.

Overview of Ofcom Rule Changes

On 1st October 2018 Ofcom are introduced new rules concerning CLI presentation. This condition requires communications providers to provide CLI facilities by default wherever technically feasible and economically viable, so that call recipients can identify the person calling them and choose whether or not to accept the call.

To assist with the identification of callers and reduce the incidence of nuisance calls, all communications providers should ensure that any telephone number associated with a call at the network level and/or presented to a call recipient is a valid, dialable number which enables the calling party to be identified, so that the call recipient can make a return call to that person.

Service providers must also offer CLI facilities (e.g. caller display) to their users free of charge (where technically and economically feasible) to encourage wider use of call screening.

This is a hugely welcome step for consumers who should experience a drop in calls from unreliable sources and arm them with decision making powers as to whether to answer a call or not.

Explanation of Network and Presentation CLI

The **Network Number** is mandatory, it must unambiguously identify the origin of the call and must not be a premium rate service, generate excessive revenue or unexpected call charges. Where the origin is outside of UK the Network Number should identify the point of ingress in the UK. This number should not be changed by other CPs in the call path (except where replaced with the new 08979 range detailed below). The network number only needs to be dialable if there is no separate Presentation Number.

A separate **Presentation Number** is optional and is designed to help the called party identify the caller and be able to return a call. If no Presentation Number is provided the Network Number will be displayed to the called party instead (subject to privacy restrictions). Again, the number must not be premium rate service, generate excessive revenue or unexpected call charges. The call originator must have authority to use the presentation number and service providers must give them the choice to display the number or withhold it.

Service Provider Types

Call originators

The originating service provider must require their users, by way of a contractual agreement, to only use network and presentation numbers that they have the right to use. For example, it may be a number that you have assigned them or that you have imported on their behalf.

The presentation number must be a valid number (where a UK number is used it must be from a range declared available for allocation by Ofcom), it must be working and able to accept a return call. It should also uniquely identify the caller and must not be a premium rate number or a high-cost nongeographic range. If no such presentation number is provided with the call then the network number will normally be used (subject to privacy requirements), therefore the same rules must be applied to the network number in those circumstances.

Originating service providers should ensure that the network number provided is directly associated with the client's line, service or account. Failure to send a legitimate network number may result in calls being blocked or a network number being inserted by a transit network.

As well as the integrity of the CLI itself, privacy controls are also of great importance. If an originating service provider has reason to believe that the upstream or downstream carrier or service provider will not handle a withheld flag correctly they should not pass the relevant CLIs onwards.

Ofcom have made it clear that a misleading CLI or one used specifically for the purpose of revenue generation will be considered misuse and investigated.

Wholesale Networks/Transit Providers

If a transit network is passed a call from an originator that is not regulated under the Ofcom General Condition (e.g. international) and the call has an invalid, missing or suspicious CLI the network must replace the number with one within the 08979 range allocated by Ofcom. This will help others in the call path identify that the call has originated from potentially unknown origins and will be used to help terminating networks make routing decisions.

The 08979 number also assists networks to trace the call back along the call path to the source of the call within the UK. The 08979 number does not have to be dialable and a list of ranges allocated is available on the Ofcom website to assist with any queries relating to calls that include this number type.

Where a network number has been inserted it must be flagged as 'unavailable' by default so as not to pass it on to the called party.

Call Terminators

The terminating network must take reasonable steps to stop calls with a malformed or suspicious CLI from reaching the called party, this may include blocking calls or pushing calls straight to voicemail. Comms Council UK have interpreted current guidance to mean that the service provider delivering calls to the called party is best placed to make routing decisions of this nature due to their direct relationship with the user.

We anticipate that some users, particularly businesses, will wish to receive all calls regardless while other users will require stricter control over calls received. We recommend that Comms Council UK members document their processes for establishing the requirements of their customers in this regard so they can demonstrate compliance with the Ofcom guidelines.

The terminating provider must not alter the network number that was provided by the call originator or transit network, to do so would modify the integrity of the call handling to this point and be counter-productive, except where they have received the call from a network that is not regulated by the General Conditions (e.g. International).

Terminating networks are expected to carry out reasonable checks on any presentation number received, including length of number inserted and status when compared to the National Numbering Plan maintained by Ofcom. The current guidance from Ofcom does recognise that it is not technically feasible to verify ownership or allocation of individual numbers at this stage but checks such as number of digits or format may be appropriate for many providers to satisfy this requirement.

If anonymous call reject is applied by the called party the terminating network must send back a suitable indicator to inform the caller that the reason for the call failing was due to call barring or screening to avoid recurring attempts to place the call.

Blocking or Stopping Calls

All Service Providers and Transit Networks that may block, divert or prevent calls progressing due to malformed or suspicious CLI are strongly advised in the relevant Ofcom guidance to have a process in place to review their decisions and handle disputes. The dispute process should be published on the Service Providers website and advertised internally to ensure prompt action in the event of legitimate calls being blocked inadvertently.

Technical Notes

Guidance is provided by the NICC who have created a set of agreed standards. This guidance is currently under review to bring it up to date with the new CLI rules. All members should familiarise themselves with the relevant documents listed below and check for updates periodically.

CLI Requirements:

<http://www.niccstandards.org.uk/files/current/ND1016v3%202%201.pdf?type=pdf>
<http://www.niccstandards.org.uk/files/current/ND1439V2.1.1.pdf?type=pdf>

Interworking Standards:

http://www.niccstandards.org.uk/files/current/nd1017_2006_07.pdf?type=pdf
<http://www.niccstandards.org.uk/files/current/ND1035V2.1.1.pdf?type=pdf>