

Ofcom Consultation: Tackling Scam Calls from Abroad

CCUK response - October 2025

About CCUK

1. Comms Council UK is a membership-led organisation that both represents and supports telecommunications companies that provide services to 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.
2. The membership is a mixture of network operators, service providers, resellers, suppliers and consultants involved in a sector that is diversifying rapidly. CCUK 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.

Introduction

3. CCUK welcomes the opportunity to respond to Ofcom’s consultation on Tackling Scam Calls from Abroad. While we strongly share Ofcom’s goal of tackling scam calls and protecting UK consumers, we have grave concerns regarding the approach Ofcom has taken to tackling mobile spoofing. Our concerns are that the proposals:
 - a. Do not fully take into account the fact that non-mobile networks, including many VoIP and intermediary operators, cannot easily implement CAMEL-based routing technology;
 - b. Will negatively impact innovative UK providers as a result;
 - c. Do not fully address fraudulent calls from abroad;
 - d. Provide little benefit to the consumer, and may in fact inadvertently increase victims of fraud by encouraging consumers to assume that if a number is not withheld, it must be trusted.
4. We also have broader concerns regarding the general approach taken to tackling fraudulent calls and encourage a more all-encompassing approach to fraud remedies. A long-term plan is needed to ensure effective and efficient support for areas such as law enforcement, and prevent unnecessary additional costs for the telecommunications industry. Though we understand this is not the purpose of the consultation, we have outlined them as such further below.
5. We welcome further opportunities to engage with Ofcom on this, and encourage where possible for Ofcom to revisit the terms of the consultation to explore future-proof proposals which work for different types of voice services and which could deliver greater long-term protection against scam calls.

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6. The UK's communications landscape is rapidly transitioning to an all-IP environment, where voice services are increasingly delivered via VoIP rather than traditional public switched telephone network (PSTN) infrastructure. In this environment, calls are frequently originated and terminated over the internet, often using "over the top" (OTT) applications and services that do not rely on a single underlying network.
7. Furthermore, the UK communications sector has seen a dramatic shift in the last three decades, on the telecoms side specifically, moving from a restrictive licence regime with two or three notable telecoms providers to a permissive regulatory environment with few constraints on market entry. This has led to a much more diverse eco-system, involving many hundreds if not thousands of "Communications Providers" (CPs) who have generated intense competition with high levels of innovation and technical advancements that have enabled converged communication solutions to develop to meet evolving customer needs.
8. A more nuanced understanding of call routing is essential to avoid unintended consequences in the approach proposed by Ofcom for tackling mobile spoofing. A call's international route can be as follows:
 - A. A call is initiated by a user or application to the UK from outside of the UK:
 - a. This may originate from a traditional mobile handset, a VoIP service, a business phone system, or an OTT platform.
 - b. The originating number could be a standard UK mobile number (+447...), a virtual mobile number, or another type of CLI.
 - B. The originating service/provider routes the call:
 - a. If the call is from a mobile handset, it is usually routed via the mobile provider's own network infrastructure or direct transit arrangements.
 - b. If the call is from a VoIP network, OTT app, or cloud based application hosted in an international data centre (e.g., Frankfurt or Dublin), it is usually routed over IP networks to a UK interconnection partner or carrier.
 - C. The call enters the UK telecommunications network:
 - a. The first UK operator to receive the call is known as the 'International Gateway', that is a carrier that has an interoperability arrangement with the originating country or the originating provider depending on the selected call path.
 - D. The call is routed toward the number's home network:
 - a. For calls originating on a mobile network, CAMEL (Customised Applications for Mobile network Enhanced Logic) often used.

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13. For context, focus on calls transiting a typical mobile network is misplaced; this range is not exclusively operated by UK mobile networks. In fact, many legitimate UK entities operate virtual numbers within this range, using infrastructure based outside the UK for legitimate business purposes. Non-mobile networks, including many VoIP and intermediary operators, cannot easily implement CAMEL-based routing technology. As a result, these operators face a binary choice: either permanently withhold CLI on calls from abroad or risk non-compliance. This approach unfairly penalises legitimate operators and does little to actually curtail fraudulent activity
14. By focusing solely on a traditional mobile-centric solution, the proposals also threaten the competitiveness and diversity of the UK's all-IP voice market. Many intermediary operators and over-the-top service providers deliver valuable services that would be unnecessarily disrupted by these requirements. Furthermore, the proposals would mainly impact those operators who are already compliant and engaged with best practices, while failing to address bad actors who routinely flout regulations.
15. Beyond impacting innovative UK providers, the proposals ultimately do not adequately benefit consumers, and we fear they inadvertently place consumers at greater risk. The proposals may in fact encourage a false sense of security where a visible UK mobile number is trusted by default. This would result in consumers becoming more vulnerable to scam calls originating from non-compliant networks. However, fraudsters are agile and quick to adapt to new controls, and if consumers are conditioned to distrust withheld numbers but trust visible ones, they may be more easily duped by sophisticated scams using genuine-seeming UK mobile CLIs. This undermines the goal of consumer protection and could erode trust in UK communications services more broadly.
16. Finally, this consultation does not fully take into account the international element of fraud in a world in which some territories do not use VoLTE/CAMEL.

Conclusion

17. Taking a step back, we are concerned that Ofcom's review adopts too narrow a focus. The fraud landscape is evolving rapidly. For example, scammers are moving beyond voice calls to exploit SMS "blasters" and other emerging vectors. Ofcom's approach must be future-proof and outcomes-focused. It can do this by considering how to pre-emptively disrupt new fraud techniques before they gain traction, rather than reacting after the fact.
18. The UK must become more proactive in order to keep pace with the ever-changing fraud landscape and technologies, and needs a different approach in order to achieve this. However, these changes must be backed up with not only supporting regulation, but the enforcement of such regulation, including taking action against telecom providers who ignore their existing regulatory obligations, in a way which is unfair on the rest.
19. Additionally, the telecoms sector requires solutions that will enable the identification of bad actors within the sector, prevent these parties from continuing to operate and support the sharing of information that will enable other organisations such as law enforcement to be proactive.

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20. Ultimately, while Ofcom's proposals attempt to address mobile spoofing, they overlook the core issue: the absence of a mechanism to unambiguously identify callers. Regardless of number type, it remains far too easy for individuals to conceal their identity while using legitimate-looking numbers, leaving the UK's telephone network an inexpensive and low-risk platform to support the enablement of fraud. Until the industry and regulators collaborate to establish verifiable caller identity across all communication types—ensuring every actor is accountable—piecemeal technical measures will continue to burden compliant providers without tackling the root cause of the problem.
21. We therefore urge Ofcom to engage deeply with the full spectrum of the communications industry, including intermediary and over-the-top providers. We welcome further opportunities to engage with Ofcom for proactive suggestions on how this can be done.
22. In conclusion, we believe a wider review is essential to make significant impact going forward. However, for the purposes of this specific consultation which aims to address the current loophole of mobile CLIs specifically being freely passed through on international calls, we urge Ofcom to reconsider the alternative solutions presented to them during the call for inputs stage. A SIP proxy server, such as that selected to address this is in Ireland, appears to be a relatively simple and cost-effective way to make validation available to all types of communications provider. Furthermore, we would consider it in the interests of the MNOs to assist the wider industry in this way in order to afford greater protections for their own consumers and the reputation of their sector. The introduction of this or a similar tool would also be a good foundation for further validation of users in future as the mobile and 'fixed' sectors converge more over time.