

**Case T-036 Calling Line Identity Review. Jersey Airtel Limited's response to Non-Statutory Draft Decision published 21<sup>st</sup> November 2021.**

**21<sup>st</sup> January 2022**

Via email to Ian Ronayne: [ian.ronayne@jcra.je](mailto:ian.ronayne@jcra.je) & [info@jcra.je](mailto:info@jcra.je)

Below, please find our comments in blue, to the draft decisions listed in section 5.2 of the document and Annex A – Proposed new license condition.

**DRAFT DECISION:**

Following the Call for Information consultation, the Authority proposes:

- i. To proceed with the review of Calling Line Identity (CLI) facilities.

[We are in agreement with this ongoing review.](#)

- ii. To modify telecoms licences to clarify expectations for the provision of CLI facilities, with the proposed new conditions set out in Annex A of this Non-statutory Draft Decision.

[Our comments in relation to Annex A are included below.](#)

- iii. To work within the Authority's designated role, powers and resource constraints in support of efforts to limit local telecoms-based fraud.

[We welcome JCRA's role to limit local telecoms-based fraud.](#)

- iv. To further evaluate the introduction of a centralised CLI-fraud mitigation system through a structured engagement with licensed operators, specifically considering: (a) The benefits to islanders of introducing the Ofcom-driven Do Not Originate (DNO) blacklist system compared with the resources required from licensed operators to implement and manage; and (b) The merits or otherwise of other centralised operator approaches to mitigating CLI-fraud for the benefit of islanders.

[We welcome the decision to implement a centralised fraud mitigation system. This is subject to receiving further details around the design and commercial aspects of having a common data base for all local operators. Request that JCRA shares further details of costs incurred by Ofcom as well as to operators in order to benchmark any local impacts.](#)

- v. Not to publish specific CLI guidance within this review, but consider doing so in the future should the planned licence condition not sufficiently clarify expectations.

[Any future guidance/change is subject to satisfactory technical/commercial evaluation.](#)

## ANNEX A - Calling line identification facilities

X.1 The Licensee must provide Calling Line Identification Facilities, and enable them by default, unless they can demonstrate that it is not technically feasible or economically viable to do so.

By default, we are providing CLI to all our subscribers.

X.2 The Licensee must inform Subscribers if Calling Line Identification Facilities are not available on the service they are providing to those Subscribers.

Please refer to answer to question 1 – CLI services are being provided by default.

X.3 When providing Calling Line Identification Facilities, the Licensee must: (a) ensure, so far as technically feasible, that any CLI Data provided with and/or associated with a call includes a valid, diallable number which uniquely identifies the caller; and (b) respect the privacy choices of Users.

- (a) We are passing over CLI information for all outgoing voice calls generated from our subscriber to the end user with a valid A number which can be dialed back to the source.
- (b) If our understanding is correct, the question asks for clarity of number masking. We offer the facility for our subscribers to mask their number if required, when making an outgoing call. In reverse we do not offer the facility for our subscribers to unmask an incoming call. If this does not answer your question, please provide further clarity.

X.4 The Licensee must not charge Subscribers any additional or separate fee for access to or use of standard Calling Line Identification Facilities.

There are no additional charges.

X.5 Where technically feasible, the Licensee must: a) take all reasonable steps to identify calls, other than calls to Emergency Organisations, in relation to which invalid or non-diallable CLI Data is provided; and b) prevent those calls from being connected to the called party, where such calls are identified.

- (a) For outbound calls originating from Jersey Airtel numbers, we are providing full CLI facilities. Incoming calls to Jersey Airtel numbers are not being monitored for valid CLI.
- (b) We don't have the capability to prevent inbound calls from being connected. We welcome the JCRA approach to a centralised CLI fraud mitigation, subject to further satisfactory technical and commercial evaluations.

X.6 This Condition applies subject to the requirements of relevant data protection legislation.

- (a) We will comply with all local data protection legislation in relation to any new CLI related license conditions subject to satisfactory technical and commercial evaluations.

If you require any further clarifications on our responses, please do not hesitate to contact us.

**Jersey Airtel Limited**  
**21<sup>st</sup> January 2022**