



24th January 2022

Ian Ronayne
Interim Case Officer
Jersey Competition and Regulatory Authority
2nd Floor Salisbury House
1-9 Union Street
St Helier
Jersey JE2 3RF

Dear Ian

Calling Line Identity (CLI) facilities – JCRA 21/48

Thank you for the opportunity to provide further comment on your Non- statutory Draft Decision JCRA 21/48, repeated below.

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

Home Net Ltd response: Agreed.

1.2 To modify telecoms licences to clarify expectations for the provision of CLI facilities, with the proposed conditions:

Condition 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.

Home Net Ltd response: Agreed.

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

Home Net Ltd response: Agreed.

Condition 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;

Home Net Ltd response: Agreed in principle, although "technically feasible" is somewhat open end, regarding the cost of implementation, given the price of some services. We request the JCRA consider narrowing its definition, to "reasonably practical".

(b) Respect the privacy choices of Users.

Home Net Ltd response: Agreed in principle, however we wish the JCRA to limit this to the terms and conditions of service purchased, whilst compliant with Jersey Data Protections Laws

Condition X.4 The Licensee must not charge Subscribers any additional or separate fee for access to or use of standard Calling Line Identification Facilities.
Home Net Ltd response: Agreed.

Condition 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

Home Net Ltd response: Agreed.

b) prevent those calls from being connected to the called party, where such calls are identified.

Home Net Ltd response: Agreed in principle, however we wish the JCRA to consider adding "where reasonably practical" to this condition.

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

Home Net Ltd response: Agreed.

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

Home Net Ltd response: Agreed.

1.4 To further evaluate the introduction of a centralised CLI-fraud mitigation system through a structured engagement with licensed operators, specifically considering:

1.4.1 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.

Home Net Ltd response: Agreed, this should be further evaluated.

1.4.2 The merits or otherwise of other centralised operator approaches to mitigating CLI-fraud for the benefit of islanders.

Home Net Ltd response: Agreed, this should be further evaluated.

1.5 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.

Home Net Ltd response: Disagreed, we believe it is the responsibility of the JCRA to issue guidance, emphasising individual phone numbers are owned by the end customer.

We trust you find our comments of assistance and please do not hesitate to contact me if you require clarification or have any further questions.

Yours Sincerely

Ian Ridgway

Home Net Limited

Company Reg No: 67490

Registered Office: Bramble Bank, Old Beaumont Hill, St Peter, JE3 7EA.

Director