



JT's Non-Confidential Response to
JCRA Non Statutory Draft Decision –
Calling Line Identity

24th January 2022

1. Introduction

JT (Jersey) Limited, (“JT”) JT welcomes the opportunity to respond to this consultation and recognises the importance of CLI in providing consumers with some protection against telephone-based fraud, allowing consumers to make informed decisions on whether to answer or reject a call. This is a non-confidential response and can be published in full.

2. JT’s Response to Draft Decisions

Draft Decision 1: To proceed with the review of Calling Line Identity (CLI) facilities.

JT welcomes the JCRA’s decision to proceed with the review of CLI facilities.

Draft Decision 2: To modify telecoms licences to clarify expectations for the provision of CLI facilities.

JT supports the JCRA’s decision to clarify the expectations for the provision of CLI facilities.

Draft Decision 3: To work within the Authority’s designated role, powers and resource constraints in support of efforts to limit local telecoms-based fraud.

JT supports the JCRA’s approach in supporting efforts to limit local telecoms-based fraud and recognises that the JCRA and all CI operators have limited resources and must work within those constraints.

Draft Decision 4: To further evaluate the introduction of a centralised CLI-fraud mitigation system through a structured engagement with licenced operators, specifically considering:-

- (a) The benefits to islands of introducing the Ofcom-driven Do Not Originate (DNO) blacklist system compared with the resources required from licenced operators to implement and manage; and**
- (b) The merits or otherwise of other centralised operator approaches to mitigating CLI-fraud for the benefits of islanders.**

As stated in the call for information (CFI), JT is an active participant in the Jersey Fraud Prevention Forum (JFPF)¹, collaborating with the States of Jersey Police and other local operators. In addition, JT collaborates with other industry groups (such as the GSMA fraud forum and the Mobile Ecosystem Forum) on the techniques that operators around the world are employing to protect consumers. We note that Sure

¹ www.fraudprevention.je

suggested a more collaborative approach between CI operators and suggested an industry forum to discuss these issues and share information. In our response to the CFI we highlighted the fact that the CI operators are in a relatively unique position and should collaborate to discuss a centralised approach to limited telecoms-based fraud. We suggested the establishment of a CI 'perimeter' whereby calls coming into the islands from a non-CI provider with a local CLI (indicating that this has been originated from outside of the Islands) could be assumed to be fraudulent and blocked in transit (this approach is broadly adopted in other jurisdictions such as Australia). Exceptions could be handled by the establishment of a central registry to ensure operators legitimate 'whitelist numbers' could be passed. We would like to explore this idea with the other operators and would request that the JCRA establish an industry forum where approaches could be discussed.

JT is supportive of exploring the benefits of the Ofcom DNO initiative and to understand more details on how the scheme works, the frequency of updates and how Jersey operators could get involved in the scheme.

Draft Decision 5: To not publish specific CLI guidance with this review, but consider doing so in the future should the planned licence condition not sufficiently clarify expectations.

We do not agree with draft decision 5. JT would like to have clarity around CLI and made specific comments in relation to the Ofcom guidelines in our response to the CFI which are repeated again at Appendix 1.

The JCRA has outlined the desire to evaluate the introduction of centralised CLI-Fraud mitigation systems. As outlined in JT's response to Draft Decision 4, a number of solutions could present which establish a tighter control on issuance of Jersey based CLI, in a similar manner to those adopted by other jurisdictions. However, this would be materially challenging to implement in the absence of clear guidelines on what constitutes a valid CLI, or the types of valid presentation numbers available. This becomes further problematic where non-CI based licenced operators or unlicenced operators (who have not responded to the CFI) may be operating under different guidelines or principles than those adopted by an unofficial local consensus (as suggested by the JCRA), or where non-CI based unlicenced operators are providing services to local customers.

The below are some recent examples which demonstrate the need for CLI guidelines:-

Example 1

JT has seen instances where calls (with an 01534 CLI) have come into the JT network from 3rd party carriers where the CLI presented was from an 'invalid number' (for example: a number which had been recovered and no longer in use and to which a return call would not be possible). In some instances, it has been possible for JT to identify and notify the originating network by determining the 'Network Number' in use (aligned to the OFCOM guidelines). However, in some instances, the originating networks have not adhered to the OFCOM guidelines.

Example 2

In at least one instance, JT has identified an Emergency Call from a 3rd party network where the CLI presented was from an 'invalid number'. This raises three challenges:

Firstly, the Emergency Call did not originate from a licenced operator, or a carrier interconnected with JT under a Reference Interconnect Offer, and did not adhere to any Jersey regulatory frameworks with regards to Emergency Calls.

Secondly, in this instance, the call was routed to JT (and therefore onwards to the Emergency Services), however calls through other carriers (namely BT) would be unlikely to reach JT, instead arriving at a UK Emergency Call Handling Agent, and the call would not be connected to the Jersey Emergency Services.

Thirdly, with an 'invalid number', if the Emergency Services had a requirement to make a return call to the caller, they would not have been able to connect.

Appendix 1 - JT Comments on Ofcom CLI Guidelines

Presentation Numbers (Type 1 – 5)

JT currently follow Ofcom guidelines for Type 1 and Type 2 presentation numbers. The Ofcom description for Type 1 and Type 2 is included below:-

Type 1

A Presentation Number is generated by the subscriber's network provider. The number is stored in the network and applied to an outgoing call at the originating node in the public network by the provider. Because the number is applied by network equipment there is no need for it to be verified each time a call is made – instead the level of authenticity will depend on the checks made by a network provider that a subscriber is entitled to use a particular Presentation Number.

Type 2

A Presentation Number which identifies a caller's extension number behind a DDI switchboard. Although the number or partial number is generated by the user's own equipment, the network provider is able to check that it falls within the range and length allocated to a particular subscriber. In this way the authenticity of the number may be ensured. It should be noted that some network providers classify Type 2 Presentation Numbers as network numbers (especially where the full number is constituted at the local exchange). This type of number is considered to carry sufficient authenticity to be classified as a network number and is carried as such by some networks.

JT currently do not provide Type 3 – 5 presentation numbers as a service but we believe that other operators in Jersey do. Type 3 is described in the Ofcom guidelines as:

Type 3

A Presentation Number limited to the far-end break out scenario where a call's ingress to the public network may be geographically remote from where it was originated. The number is generated by the user's equipment and is not capable of being subjected to network verification procedures. Verification is based on a contract between the subscriber and the network provider in which the subscriber gives an undertaking that only authentic presentation numbers will be generated.

To give context to Type 3, we describe a use case that JT has seen in Jersey. 'Network Provider A' (for example JT) has a number allocated to it by Ofcom which it provides to a 'Subscriber' for a service. The 'Subscriber' is also taking a service from 'Network Provider B' (for example Newtel) who contracts with another network provider 'Network Provider C' (for example Gamma). In this scenario the CLI is 01534 88XXXX (JT allocated number range). Type 3 presentation allows the subscriber to request that their outgoing CLI for calls via 'Network Provider B/C' uses the number for the service which they are taking from 'Network Provider A' (JT in this scenario). Therefore in the outlined scenario, calls would enter the UK PSTN from Gamma with a JT Jersey based CLI.

Ofcom CLI guidance states that Type 3 can be done under "*contract between the subscriber and the network provider in which the subscriber gives an undertaking that only authentic presentation numbers will be generated*". JT currently has no formal process in place to support Type 3 and would like the JCRA to look into specific guidance for this.

JT believe that clarity is required from the JCRA, in the following areas:

- To ensure the CLI is a "valid, dialable telephone number", the contract should be between the two network providers and the subscriber, such that if the subscriber ceases the service with network provider A, or has their service terminated, the network provider A must notify network provider B that the number is no longer a 'valid, dialable telephone number'.
- To facilitate lawful intercept requests, there should be a contract between the two network providers and the subscriber, such that if a lawful intercept request is raised to network provider A against the subscriber's number, network provider A can inform the authorities that network provider B is handling the subscriber's outbound calls.
- Where network provider B is used for the outgoing calls, it should be clarified that all inbound calls to the number must continue to terminate on network provider A (i.e. the network provider to which the number block is allocated). This will then ensure that network provider B does not use internal local routing for the number range.
- where network provider B is used for outgoing calls, it should be established that calls to Emergency Services must be correctly terminated to the Jersey Call Handling service – a call to the Jersey Emergency Services which incorrectly enters the PSTN in the UK or other network may have no method of establishing communications to the Jersey Call Handling service.

- where network provider B is an unlicensed provider using an 'over the top' VoIP service, operating under Ofcom guidelines, but outside of the scope of the JCRA. Jersey's position as part of the UK numbering plan can cause confusion (especially to UK providers) who may not be aware of the different licencing regimes in the crown dependencies, and therefore apply UK conditions / guidelines to Jersey number ranges. Under such scenarios, guidelines from the JCRA may not be adhered to, access to the Emergency Services may not be available, and requests for lawful intercept may not be fulfilled.

Type 4 is described in the Ofcom guidelines as:

Type 4

A Presentation Number available for the onward transmission of the originating number where a call breaks into a private network and breaks out again before termination, as in a DISA17 scenario. On the break out leg the number is generated by the user's equipment although it will have already been verified in consequence of having been delivered to the private network. To maintain the verification it is necessary to ensure that the number submitted by the private network is the number that was received.

Network providers wishing to offer a Type 4 service will require a contractual commitment from customers that they will only submit CLIs that have been received from the public network.

Whilst JT do not provide Type 4 today, we are broadly happy with the contractual obligations around these types of numbers. However, JT would propose that this could be tightened (where technically feasible) to restrict this to diverted calls with appropriate signalling headers, i.e. where the call originates directly from the PBX, this should be screened as normal.

Type 5 is described in the Ofcom guidelines as:

Type 5

Presentation numbers that identify separate groups of callers behind a private network switch wishing to send different outgoing CLIs. A typical scenario is a call centre making calls on behalf of more than one client. Type 5 Presentation Numbers are generated by the user's equipment. Subscribers will need to enter into a similar contractual commitment with their network providers as for Type 1 Presentation Numbers – that they are entitled to use the numbers they have selected.

JT believe the same clarity is required for Type 5 as for Type 3, however we recognise that due to the size of



Jersey it is unlikely there will be many Jersey use cases that require Type 5 and we are not aware of any requests for this.