



Case T-036

Guidance on the provision of Calling
Line Identification (CLI) Facilities

Response to consultation and final
Guidance

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1 Overview and summary

- 1.1 The duties of the Jersey Competition Regulatory Authority (the **Authority, we, us or our**) include protecting Islanders as far as reasonably possible against the fraudulent use of telecoms systems, and through monitoring development of telecoms systems and technology assess whether changes or advancements may benefit or harm Islanders.
- 1.2 Calling Line Identification (**CLI**) Facilities play an important part in helping limit fraudulent activities through allowing the telephone number of a person making a call to be displayed to the person receiving the call, who can then decide whether to answer or not.
- 1.3 Advancing technology is making it easier for fraudsters to interfere with or change CLI information presented to people receiving calls. As a result, we decided to amend certain telecoms licences issued to local Licensed Operators (**LOs**) to include a new specific licence condition (the **CLI Licence Condition**) which clarifies regulatory expectations on the provision of CLI data.
- 1.4 After consulting, we issued a non-statutory Final Decision (the **Final Decision**) and statutory Initial Notice (the **Initial Notice**) in April 2022 setting out the CLI Licence Condition which we intend adding to the licences of Class II and Class III licensees. Responding to requests from LOs, we decided to delay the Final Notice implementation until supplementary Guidance on the Provision of CLI Facilities (the **Guidance**) is available. The purpose of the Guidance is to help ensure a common approach to handling CLI Data, its accuracy throughout the transmission of the call and protecting the privacy choices of end users.
- 1.5 On 5 January 2023, we issued proposed 'Guidance on the provision of Calling Line Identification (CLI) Facilities' for non-statutory consultation (the **Consultation**), which closed on 16 February 2023.¹ Having carefully considered responses received, the Authority has amended the proposed Guidance where it considers appropriate, with Annex A of this document containing a marked-up version showing changes to be incorporated in the final Guidance.
- 1.6 Having consulted, the Guidance published in this document is considered final and will become current following a Final Notice modifying Class II and Class III licences to include the proposed CLI Licence Condition. A 'clean' version will be accessible on the Authority's website or available on request. Any subsequent amendments will be made through a similar non-statutory consultation process before issue.

¹ JCRA Document No 23/01 Guidance on the provision of Calling Line Identification (CLI) Facilities: Proposed Guidance for consultation – see <https://www.jcra.je/cases/2021/t-036-calling-line-identity-review/t-036-calling-line-identity-review-draft-guidance-for-consultation/>

2 Introduction and background

2.1 This section provides summary information on the Consultation and proposed Guidance. Its contents are:

- [Background to Consultation](#)
- [Purpose and scope of proposed Guidance](#)
- [Legal framework](#)
- [Process and timetable](#)

Background to Consultation

2.2 CLI Facilities allow the telephone number of a person making a call to be displayed to the recipient of the call. This gives call recipients the ability to identify the person or organisation calling them, and to make informed decisions about how to handle incoming calls. CLI Facilities also assist regulators and enforcement bodies with the identification, tracing and prevention of unwanted nuisance calls, which can cause significant annoyance and, in some cases, distress for consumers.

2.3 Advancing technology is increasing opportunities for using CLI Facilities for non-legitimate purposes. In view of this, there is considerable national and international technical development and regulatory effort being devoted to counter fraudsters and ensure users have trust in telecoms networks. We believe that Islanders should enjoy the same level of trust by ensuring a similar approach to best practice CLI-related regulation wherever possible and practical.

2.4 For historic and functional reasons Jersey's telecoms networks have important connections to those of the UK and Jersey's telephone numbers are part of the National Telephone Numbering Plan², which is administered by UK communications regulator Ofcom. In certain scenarios, this places Jersey CLI 'inside' number ranges internationally recognised as belonging to the UK, potentially creating a situation that may be exploited by fraudsters wanting to target Jersey or UK users.

2.5 Because of this potential situation, and to align with best practice, we believe the approach to the CLI Licence Condition and supplementary Guidance should align as closely as possible with those applying in the UK. There was support for this approach within responses provided to our earlier consultations on the proposed introduction of the CLI Licence Condition.³

² The National Numbering Plan – see https://www.ofcom.org.uk/__data/assets/pdf_file/0013/102613/national-numbering-plan.pdf

³ See consultation responses associated with Call for Information - <https://www.jcra.je/cases/2021/t-036-calling-line-identity-review/t-036-calling-line-identity-review-non-statutory-draft-decision/>

- 2.6 We have already aligned the CLI Licence Condition with that used by Ofcom in its General Conditions of Entitlement⁴ and propose to issue Guidance based on that already issued by Ofcom⁵, following the same approach and including the same information, with modifications made in formatting to provide consistency with other documents issued by the Authority and in detail to take the Jersey context into account.
- 2.7 The Ofcom CLI guidance includes reference to relevant technical standards⁶, which we plan using within the Guidance. Ofcom further refers extensively to the Privacy and Electronic Communications (EC Directive) Regulations (PECR) 2003, which does not apply in Jersey. Where relevant, we will refer to provisions of the Data Protection (Jersey) Law 2018 instead.

Purpose and scope of proposed Guidance

- 2.8 The purpose of the proposed Guidance is to provide LOs with important supplemental information to ensure the requirements associated with the CLI Licence Condition are fully understood. This will help ensure a common approach to handling CLI Data, its accuracy throughout the transmission of the call and with protecting the privacy choices of end users.
- 2.9 Although the Guidance is not legally binding, it may be taken into account should we need to investigate the cause and impact of any CLI-related incidents and during any subsequent licence condition enforcement actions.
- 2.10 The scope of the Guidance will include:
- Relevant technical standards
 - Respecting the privacy choices of end users
 - Requirements for LOs providing CLI Facilities
 - Guidance on the use of network and presentation numbers
 - Call blocking and/or stopping guidance
- 2.11 We may need to make changes to the Guidance from time to time and will consult on these changes in the usual way as and when appropriate.

Legal context

⁴ See <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/telecoms-competition-regulation/general-conditions-of-entitlement>

⁵ Guidance on the provision of Calling Line Identification Facilities and other related services, published 14 May 2019 – see <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/telecoms-industry-guidance/calling-line-identification>

⁶ Principally NICC (<https://nicstandards.org.uk/>), which has responsibility for UK technical telecoms standards, and the ITU (<https://www.itu.int/en/about/Pages/default.aspx>), which is United Nations specialised agency for information and communication technologies.

- 2.12 The Telecommunication (Jersey) Law 2002 (the **Law**) sets out the primary duty of the Authority is to perform its functions as to ensure that telecoms services are provided that satisfy all current and prospective demands for them.
- 2.13 Section 7 of the Law includes a specific Authority duty to: ‘...protect and further the short-term and long-term interests of users within Jersey of telecommunication services and apparatus...’.
- 2.14 We are introducing a new CLI Licence Condition to ensure telecoms services satisfy a recognised current and prospective demand for users to be protected through minimising the non-legitimate use of CLI and potentially fraudulent call activities and that this will protect and further the short-term and long-term interests of users within Jersey. We propose to issue the Guidance to ensure that LOs more fully understand and take account of their obligations under the new CLI Licence Condition.
- 2.15 While the issuing of guidance, which is not legally binding, is outside our statutory duties, Section 9 (2) of the Law requires that we consider any representation made to us considering the running of a telecommunication system and the provision of telecommunication services in Jersey. We believe this consultation aligns with this requirement, and aligns with best practice policy making.

Process and timetable

- 2.16 Although the subject of the Consultation does not relate to a specified statutory function, we are following a structure based on the process set-out in Section 11 of the Law.
- 2.17 The timetable, which may be subject to change, for completing the process is:

Jan 2023	Consultation on proposed CLI Guidance issued
Feb 2023	Consultation on proposed CLI Guidance closed
Apr 2023	Issue non-statutory response to the Consultation and final CLI Guidance Issue amended statutory Initial Notice amending Class II and Class III licences to include the CLI Licence Condition ⁷
May 2023	Issue statutory Final Notice amending Class II and Class III licences to include the CLI Licence Condition Issue CLI Guidance
Jun 2023	CLI Licence Condition and Guidance current

⁷ We plan to amend and reissue the Initial Notice because of comments provided by JT in response to the proposed Guidance.

3 Consideration of responses to the Consultation

3.1 This section contains details on responses received to the Consultation, information on how we have analysed them and conclusions drawn. Its contents are:

- Consultation approach and responses received
- General principles applied when considering all responses
- Specific consideration of responses to consultation Question 1
- Specific consideration of responses to consultation Question 2
- Specific consideration of responses to consultation Question 3

Consultation approach and responses received

3.2 On 5 January 2023, the Authority issued proposed ‘Guidance on the provision of Calling Line Identification (CLI) Facilities’ for a non-statutory consultation, which closed on 16 February 2023, with respondents asked to consider three broad questions:

Question 1: Do you have any comments about our decision to issue Guidance on the Provision of CLI Facilities?

Question 2: Do you have any comments on the proposed approach to and scope of the Guidance?

Question 3: Do you have any comments on the proposed Guidance?

3.3 The Consultation closed on 16 February 2023, with responses⁸ received by that date from the following organisations:

- Jersey Airtel Limited (**Airtel**)
- JT (Jersey) Limited (**JT**)
- Sure (Jersey) Limited (**Sure**)

3.4 The Authority is grateful to all respondents for the time and care taken to provide comments and views on this important subject. Having carefully considered them, this document contains the Authority’s analysis of responses and conclusions drawn from each, and final Guidance incorporating amendments accepted as appropriate. This final Guidance is considered current from the date of the CLI Licence Condition Final Notice and may be taken into account by the Authority when investigating the cause and impact of any subsequent CLI-related incidents.

General principles applied when considering all responses

⁸ Non-confidential versions of responses are published on the Authority’s website alongside this document.

3.5 While individual specific responses have been carefully examined, we have applied the following general principles when considering and analysing each to arrive at conclusions:

- (a) That protecting Islanders from CLI fraud is important – while recognising there is a local context compared to the other jurisdictions, Jersey should aim to establish the same level of protection as that received by UK citizens;
- (b) That for numbering in particular, Jersey is closely interlinked with the UK - again while respecting the local context, Jersey should seek to align itself with the UK when approaching CLI regulation, to avoid the possibility of future technical or regulatory challenges to the Island's telecoms, interconnect or commercial arrangements.

Consideration of responses to consultation Question 1

Question 1: Do you have any comments about our decision to issue Guidance on the Provision of CLI Facilities?

Summary of responses

3.6 All respondents support our plans to issue Guidance, with JT also highlighting the importance of alignment with other related jurisdictions.

Our analysis

3.7 We welcome the support offered and agree with importance of alignment with other jurisdictions where possible and practical.

Our conclusion(s)

3.8 The Authority will proceed with issuing the Guidance.

Responses to consultation Question 2

Question 2: Do you have any comments on the proposed approach to and scope of the Guidance?

Summary of responses

3.9 Airtel suggests we should also consider the implementation of a centralised CLI fraud mitigation system, such as the Do Not Originate (DNO) list implemented by Ofcom in UK.

3.10 JT notes that the historic absence of CLI obligations in Jersey has led to LOs adopting approaches that align with national and international standards, and that in the UK Ofcom has recently consulted on enhancing its licence obligations and supplementary guidance relating to CLI

Facilities (**2022 Ofcom CLI Guidance**)⁹. JT further states that Ofcom’s planned enhancements create challenges because the new guidance extensively supersedes our proposed Guidance.

- 3.11 Referring to the 2022 Ofcom CLI Guidance, JT draws attention to its focus on limiting the threat of fraudulent international calls, whereas the original focus was on national calls. JT believes that the threat to Islanders is more likely to come from sources outside of Jersey and therefore our proposed Guidance focus should be on this area.
- 3.12 In the context of the 2022 Ofcom CLI Guidance, JT further draws attention to specific issues relating to incoming CLI from the Crown Dependencies and potential concerns expressed by UK operators on this matter with Ofcom. Also that a ‘back-door’ into the UK may be created by us not adopting the 2022 Ofcom CLI Guidance.
- 3.13 JT raises a further concern that the absence of a pan-CI approach to CLI regulation may create a risk of a different regime in Guernsey, creating challenges for LOs with pan-CI networks.
- 3.14 Finally, JT draws attention to our statement on ‘relevant technical standards’ and expresses an expectation that the 2022 Ofcom CLI Guidance will mean these will be updated or superseded.
- 3.15 In view of all these concerns, JT proposes that we pause introduction of our proposed Guidance and aim for parity with the UK and Guernsey and to incorporate learnings from the implementation of the 2022 Ofcom CLI Guidance.
- 3.16 Sure offers broad support for our intention to align with the UK approach to CLI licence conditions and guidance while taking the Jersey context into account where relevant.

Our analysis

- 3.17 We agree with Airtel’s suggestion to also consider further CLI-fraud prevention systems, such as the DNO list and will do so outside the context of the planned CLI Licence Condition and proposed Guidance.
- 3.18 On JT’s range of concerns and proposal that we pause introduction of our proposed Guidance, we have analysed under three broad headings:
 - (a) The impact of the 2022 Ofcom CLI Guidance on our proposed Guidance;
 - (b) The need for alignment with other relevant jurisdictions; and
 - (c) Potential changes to technical standards.

The impact of Ofcom’s enhanced CLI guidance on our proposed Guidance

- 3.19 We acknowledged Ofcom’s consultation on enhancements to its CLI licence condition and associated guidance within our non-statutory Final Decision to introduce the CLI Licence

⁹ Ofcom: updated Guidance on the provision of Calling Line Identification facilities and other related services – see <https://www.ofcom.org.uk/consultations-and-statements/category-2/improving-cli-data-accuracy>

Condition¹⁰ but stated that in the interests of protecting Islanders in the short term we would continue with our plans rather than pause to await the outcome of Ofcom’s work.

- 3.20 Considering Ofcom’s planned CLI licence condition amendments¹¹, we note they involve an important though minor modification to one section of Ofcom’s General Conditions of Entitlement to better clarify which calls operator should identify as invalid and prevent from reaching the called party. The related updated guidance, which applies from 15 May 2023, contains a range of more detailed modifications clarifying the amended licence condition, additions on the handling of international calls, information on related CLI Facilities and makes other minor amendments.
- 3.21 We recognise the merits of the 2022 Ofcom CLI Guidance. As stated in Section 2.5 of this document, we believe our approach to CLI regulation should align as closely as possible with that applying in the UK. Mindful of this, we intend continuing the development of local CLI regulation beyond that contained in the presently planned CLI Licence Condition and proposed Guidance.
- 3.22 However, making enhancements and updates that affect licence conditions and associated guidance requires proper consideration of their impact and for us to take the views of stakeholders including LOs into account through our established non-statutory and statutory consultation and decision-making process.
- 3.23 Other priorities mean we cannot carry out the process for considering further CLI regulation enhancements immediately, but will schedule for a suitable time in the future. In view of this, we must consider the advantages / disadvantages of stopping the present process introducing the CLI Licence Condition and associated Guidance against delaying potentially increased CLI fraud protection for Islanders.

The need for alignment with other relevant jurisdictions

- 3.24 We concur with JT that CLI regulatory alignment with the UK and pan-CI is desirable. Not aligning with the UK may create scenarios in which Jersey is seen as a potential ‘loophole’ by the UK regulator, UK operators, the UK government and possibly organisations planning to commit fraudulent CLI activities in the UK. Aligned with our general principle included in Section 3.5 of

¹⁰ Document No. JRCA 22/22 Calling Line Identity (CLI) facilities: proposed telecommunications licence review and potential for limiting telephone-based fraud Non-statutory Final Decision – see <https://www.jcra.je/cases/2021/t-036-calling-line-identity-review/t-036-calling-line-identity-review-non-statutory-final-decision/>

¹¹ Changes to Ofcom’s CLI licence condition and related guidance are highlighted in ‘Improving the accuracy of Calling Line Identification (CLI) data Statement on changes to our General Conditions (GCs) and supporting guidance on the provision of CLI facilities’ – see https://www.ofcom.org.uk/__data/assets/pdf_file/0031/247486/statement-improving-accuracy-CLI-data.pdf

this document, this is one reason for us introducing the planned CLI Licence Condition and proposed Guidance, and our intentions to consider enhancing in the future.

- 3.25 We respect the view that alignment with other island regulators is desirable, but remind that we are unable to impose our views and plans on them. However, we are discussing CLI regulatory matters with them as appropriate and will aim to continue doing so.
- 3.26 While acknowledging and aiming to benefit from appropriate alignment, we also recognise the challenges of achieving and maintaining consistently across independent regulators that must primarily act in the interests of their respective jurisdictions. In view of this, we must again consider the potential disadvantage of delaying potential CLI-fraud protection in Jersey while seeking to achieve perfect alignment with other jurisdictions.

Potential changes to technical standards

- 3.27 We accept JT's point that technical standards associated with CLI and referred to in our proposed Guidance are likely to be updated or superseded as national and international standards bodies and similar agencies evolve their frameworks, guidance, recommendations and so forth, and we expect LOs to remain abreast of relevant developments.
- 3.28 However, the technical standards referred to in our proposed Guidance remain current, and therefor relevant. We expect to refer to additional relevant technical standards within any future versions of the Guidance.

Our conclusion(s)

- 3.29 We note that only JT proposes pausing introducing our proposed Guidance – there was no similar proposal from Airtel or Sure.
- 3.30 However, we have carefully considered JT's points and proposals, finding merit across all them and valid reasons for considering stopping the present regulatory process to introduce the CLI Licence Condition and Guidance. On balance, however, we conclude that doing so will delay the introduction of potentially increased protection for Islanders from CLI-based fraud, albeit that protection may be marginally less than that enjoyed by UK citizens.
- 3.31 Taking the above points into account, we therefore believe continuing with the present approach to and scope of the proposed Guidance is appropriate.

Responses to consultation Question 3

Question 3: Do you have any comments on the proposed Guidance?

Airtel

Summary of response

3.32 Airtel requests we consider and clarify certain points of concern, questioning several statements made in the proposed Guidance and the technical capabilities of Airtel to comply. Our analysis of individual points and questions is shown below.

Our analysis

3.33 Airtel states that while all its originated calls are processed with full CLI Facilities, it lacks the capability to monitor received calls for valid or invalid CLI. We remind Airtel that the CLI Licence Condition requires LOs to ‘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 prevent those calls from being connected to the called party, where such calls are identified’ where technically feasible. We therefore expect LOs to comply with this licence condition obligation, along with the supplementary clarifications provided in the proposed Guidance, and in the event of an investigation of a CLI-related incident be able to demonstrate to us why it was not technically feasible to comply.

3.34 Airtel asks the Authority to define invalid or non-dialable CLI. We refer to Section 7.10 of the proposed Guidance for a definition.

3.35 Airtel further explains modifying its network to meet certain expectations established in the proposed Guidance will require significant financial and human resource investment. We remind that the CLI Licence Condition requires LOs to ‘...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.’, and that LOs ‘... must inform Subscribers if Calling Line Identification Facilities are not available on the service they are providing to those Subscribers.’. We expect LOs unable to comply with the CLI Licence Condition as stated and supplementary clarifications provided in the proposed Guidance will be able to demonstrate valid technical or economic reasons for not doing so in the event of a CLI-related incident. We further expect LOs to strive towards achieving compliance when modifying or upgrading their networks.

Our conclusion(s)

3.36 There is no requirement to amend the proposed Guidance in response to Airtel’s comments.

JT

Summary of response

3.37 JT makes a series of general and specific observations and points relating to the proposed Guidance, which are considered and addressed individually in our analysis below.

Our analysis

3.38 JT questions the definition of ‘Emergency Organisations’ within the planned new CLI Licence Condition, noting a potential conflict with conditions within its telecoms licence. We remind that

the new Licence Condition is included in the consultation on proposed CLI Guidance for reference, having already been the subject of earlier consultations on amending telecoms licences. However, we accept the point made and will issue a new Initial Notice modifying the CLI Licence Condition prior to issuing the Final Notice.

- 3.39 JT questions why the proposed Guidance does not refer to Ofcom's DNO list. While supporting the principle of introducing this system and similar CLI fraud mitigation measures, we believe it is inappropriate to include specific reference within the proposed Guidance because ongoing provision and maintenance of the DNO is outside our remit and may be subject to change, and that other systems may be LO specific.
- 3.40 JT questions the approach of tailoring the Guidance to a Jersey context in some areas, believing it more appropriate to retain the UK context defined in the comparable Ofcom CLI guidance and to add further measures (where appropriate) for application in a Jersey context. Having carefully examined all elements of the proposed Guidance, we find that tailoring to create a Jersey context is appropriate in most instances because the Island's regulatory regime and other laws are clearly independent of the UK. However, we accept JT's point that it will be more appropriate to retain the UK context in respect of certain specific references to numbering given that Jersey numbers are effectively UK ones allocated to local LOs. We will amend the Guidance to reflect this as a result.
- 3.41 JT questions why the proposed Guidance is limited to Class II and Class III licence holders. We first remind JT that the new CLI Licence Condition related to the proposed Guidance plans to modify Class II and Class III licences only. Further that Class II and Class III licences are issued to LOs operating a public telecommunications system that has a discernible impact on the competitive market, compared to Class I licences issued to LOs having no discernible impact.
- 3.42 JT makes a specific observation on Section 5.10, noting it unlikely that national or international carriers will be obliged to comply with any specific Jersey requirements. We appreciate this point, and agree that the encouragement to reference the proposed Guidance should focus on local interconnect arrangements. Our principal concern is that every reasonable effort is made to prevent the transmission of calls bearing fraudulent CLI.
- 3.43 We accept JT's point on changing Jersey to UK in Section 7.10 of the proposed Guidance.
- 3.44 JT requests acknowledgment that Section 7.11 of the proposed Guidance does not make LOs responsible for what other operators may do outside Jersey. We agree that LOs are not responsible for the behaviour of other operators, whether inside or outside Jersey. However, we expect LOs terminating or transiting calls from other operators to comply with Sections 7.15 and 7.16 of the proposed Guidance.
- 3.45 In connection with Section 7.12 of the proposed Guidance, JT raises further concerns on the proposed Guidance (and CLI Licence Condition) not applying to Class I LOs. We first refer JT to

our analysis and comments on this matter set out in Section 3.41 of this document. However, mindful of our stated intention to ensure Islanders have increased protection from CLI-based fraud, we will consider the position of Class I LOs subsequent to issuing Guidance to Class II and Class III LOs and determine whether extending the CLI Licence Condition and Guidance is appropriate.

- 3.46 Related to the point made in Section 3.45 above, JT sets out several scenarios relating to the use of '01534' presentation numbers with non-'01534' network numbers. In response, we draw JT's attention to Section 8 of the proposed Guidance which contains information on requirements for network numbers and presentation numbers.
- 3.47 In connection with Section 7.13 of the proposed Guidance, we agree with JT that the ability to present CLI does not constitute number portability.
- 3.48 Referring to Section 7.15 of the proposed Guidance, JT again proposes that we consider updating it to more closely align with the 2022 Ofcom CLI Guidance. We respectfully refer to the analysis and comments on this matter provided in Section 3.30 of this document. We further clearly state that our intention is to examine the benefits of enhancing the proposed CLI guidance in due course, to more closely align with any enhanced UK CLI guidance and that we are working closely with Ofcom in support of its efforts to reduce national CLI fraud.
- 3.49 We accept JT's point on changing Jersey to UK in Section 7.16 of the proposed Guidance.
- 3.50 JT draws attention to a potential drafting error in Section 7.16 of the proposed Guidance. We note and will amend in the final Guidance.
- 3.51 We accept JT's point on changing Jersey to UK in Section 7.17 of the proposed Guidance.
- 3.52 We accept JT's point on Section 7.28 of the proposed Guidance and will modify to incorporate suggested text.
- 3.53 In response to JT's request for clarification on terms used in Sections 8.5 and 8.7 of the proposed Guidance, we confirm that the 'party who has been allocated that number' and 'the third party who has been allocated that number' is the subscriber who has a contract with a LO to receive telecoms services, which includes the allocation of a number. We agree with JT's point on the proposed Guidance obliging the party allocated the number to keep records and will remove from final Guidance.
- 3.54 We agree with JT's question on Section 9.2 of the proposed Guidance about the requirement to route calls to a specific CHA and will remove from final Guidance.

Our conclusion(s)

- 3.55 We will modify the proposed Guidance to include amendments stated above.

Sure

Summary of response

3.56 Sure notes the usefulness of the proposed Guidance but asks for further explanation and clarification on several aspects and draws attention to the potential time required to implement some of the solutions required to meet expectations. These points are considered and addressed individually in the analysis below.

Our analysis

3.57 Sure questions responsibility for CLI Facilities provided on certain wholesale services taken from other LOs for resale. For clarity, we generally expect the wholesaling LO to be responsible for CLI Facilities associated with any wholesale service over which they have technical control. We expect the reselling LO to be responsible for informing its customers about the CLI Facilities associated with the service.

3.58 Referring to Section 6.3 of the proposed Guidance, Sure notes its customers can prevent the display of their numbers by using a short code, but is unaware whether similar facilities are available for its customers using wholesale services provided by another LO. We refer to the clarification statement made in Section 3.57 of this document, which makes Sure responsible for informing its customers about available CLI Facilities.

3.59 Sure asks for clarification of expectation associated with Section 6.4, specifically requirements that a called party should be able to prevent the display of CLI data relating to incoming calls, specifically in the context of helplines assuring anonymity. For clarity, the intention is that a called party, i.e. the person operating the helpline, should be able to block the display of a calling party's CLI even if the calling party has chosen to not withhold it. We understand the principle, which may be an important one for certain organisations offering sensitive helpline services, and assume that it is already being delivered in the Island, potentially using customer premises equipment rather than network level technology. Sure explains that developing the necessary network level technology requires investigation, identification of a solution, testing and implementation, which could be expensive and require a considerable time commitment. We understand this and remind that any LOs unable to comply for technical or economic reasons with the CLI Licence Condition or expectations established in the Guidance should be able to demonstrate valid reasons for this position in the event we need to investigate a CLI-related incident. We further expect LOs to strive towards achieving compliance when modifying or upgrading their networks.

3.60 Sure notes its intention to offer the Anonymous Call Reject facility expected to be provided to the called party in Section 6.4 (b) of the proposed Guidance. We appreciate the information offered and that Sure are moving towards providing this facility within the next 12 months.

3.61 Referring to Section 6.5 of the proposed Guidance, Sure asks for clarification on the 'call return/1471' facility. We confirm that the requirement is that a called party can remove the

details of their last calling party by simple means such as a short code. We also note Sure's comment that short codes associated with call return erasure are not currently a facility provided to its mobile customers. We understand this is typically the situation in other relevant jurisdictions, presumably because there are valid technical or economic reasons for not making the facility available on mobile networks.

- 3.62 Referring to Section 7.16 of the proposed Guidance, Sure explains the technical, procedural and economic challenges involved in being able to establish whether the presentation CLI associated with transit and terminating calls is in service or capable of receiving a return call, and requests we modify this requirement within the Guidance. Having considered, we note that this remains a requirement in the 2022 Ofcom CLI Guidance, and therefore modifying within our proposed Guidance will create misalignment between Jersey and the UK. However, we note and appreciate Sure's explanation and concern, reminding that it is for LOs to determine what is 'technically feasible' in respect of this requirement. In the event of a future CLI-related incident involving transit or terminating calls requiring our investigation, we may ask Sure (or other LOs) to demonstrate steps taken to determine technical feasibility in relation to this matter.
- 3.63 Sure raises a concern that a conflict may exist between the CLI Licence Condition and information in the proposed Guidance, and asks for clarification to resolve. Our clarification is that:
- Licence Condition X5 requires LOs to take reasonable steps to identify and prevent calls with invalid or non-diallable CLI being connected. In this case, the explanation for what represents valid and diallable calls is shown in Section 7.10 of the proposed Guidance;
 - Section 7.15 of the proposed Guidance addresses calls received at the first point of ingress to the Jersey network that have valid and diallable CLI that is not reasonably trusted by the receiving LO, or where there is no CLI associated with the call. In this case, the LO should insert a CLI from its own range and mark it as 'unavailable', allowing the call recipient to decide whether to answer or not;
 - Section 7.22 of the proposed Guidance requires that the LO at the first point of ingress to the Jersey network ensures a privacy marking associated with the received call are retained when terminating or transiting the call – i.e. if a received call is marked 'withheld' at the point of ingress, it should retain this marking within the Jersey network. Section 7.22 identifies three possible markings: Available, Withheld or Unavailable, with the latter being either marking received at the point of ingress or added by the receiving LO following the requirement stated in Section 7.15 of the proposed Guidance.
- 3.64 Considering Sure's associated request for clarification on how to treat numbers considered 'unreliable' or lacking presentation CLI, we remind that the purpose of the proposed Guidance is to ensure LOs take a common approach to handling CLI Data, to ensuring its accuracy

throughout the transmission of the call and to protecting the privacy choices of end users. Achieving this aim should help reduce instances of fraudulent CLI use in Jersey but not eliminate, and allow for the more straightforward transmission and termination of legitimate calls. LOs may need to take further steps, potentially with our support, to detect and eliminate fraudulent calls or at least further reduce fraudulent instances. This may involve systems or processes to identify 'unreliable' calls or those that are not reasonably trusted and assess them to determine whether they are legitimate calls lacking certain CLI Data or fraudulent calls masked by CLI data. Systems such as the Ofcom DNO list may assist, for example, or call monitoring systems looking for irregularities or suspicious patterns.

Our conclusion(s)

3.65 There is no requirement to amend the proposed Guidance in response to Sure's comments.

Annex A: Final Guidance

This section contains the final Guidance for issue with amendments from proposed Guidance shown as marked-up text.

1 Introduction

- 1.1 Calling Line Identification (**CLI**) Facilities provide information about the party making a telephone call. CLI Data consists of the caller's line identity along with a privacy marking, which indicates whether the number can be shared with the recipient of the call. The CLI Data is shared between different Licensed Operators (**LOs**) who are involved in the connection of the call, and for the information to be shared reliably, it requires that the CLI Data is provided correctly and that this information is passed between networks accurately. As the CLI identifies the end user associated with a number, the privacy choices of the end user need to be respected.
- 1.2 Every call must have CLI Data that represents the point of ingress into the network, this is known as the 'Network Number'. It may also include another number representing the identity of the caller which is the telephone number displayed to the recipient of the call, this is known as the 'Presentation Number'. In many situations, the Network Number and the Presentation Number are the same number.
- 1.3 The CLI Data that is presented with a call can provide assurance to the recipient of the call about who they are talking to, and allow them to take informed decisions on how to handle incoming calls. However, the passage of CLI information can be vulnerable to misuse, for example the insertion of false information to intentionally mislead the recipient of the call as to the identity of the caller.
- 1.4 There needs to be a consistent approach to the handling of CLI Data, from call origination through to call termination, particularly for calls that pass through two or more network providers. This is to ensure that the CLI itself can be passed on accurately and that the privacy choices made by end users about their CLI Data are respected by all LOs involved in the origination, transmission and termination of that call.
- 1.5 The Class II and Class III licences we issue include a licence condition covering the provision of CLI Facilities in Jersey (the **CLI Licence Condition**) which requires LOs to provide CLI Facilities, where technically feasible and economically viable to do so. They also require LOs to ensure that any CLI Data provided with and/or associated with a call includes a valid, diallable telephone number which uniquely identifies the caller. The aim of this document is to establish the principles for this approach, setting out what is expected of LOs to meet these requirements and to provide guidance for all LOs that participate in the origination, transmission and termination of a call in Jersey

2 Background, legal context and scope

2.1 This section sets out relevant introductory information to help LOs understand the foundation and development of principles and details contained in this Guidance. Its contents are:

- Background
- Legal context
- Scope
- Relevant technical standards
- Enforcement

Background

2.2 This document sets out guidance on how LOs should approach the handling of CLI Data from the initiation of a call to its termination. The aim of this document is to ensure that the accuracy of CLI Data is protected throughout the transmission of a call and that the privacy choices of end users are respected and maintained throughout all parts of the call process, from the origination, to the transmission and to the termination of a call.

2.3 A common approach by all LOs is necessary as this will give LOs and end users certainty about the information that is provided with a telephone call. This is because the end-to-end conveyance of a call originated by an end user frequently requires the collaboration of several network providers and it is important that all LOs treat CLI Data in the same way.

2.4 For historic and functional reasons Jersey's telecoms networks have important connections to those of the UK and Jersey's telephone numbers are part of the National Telephone Numbering Plan¹². For this reason, we have chosen to align this Guidance with that established by UK communications regulator Ofcom, taking the Jersey context into account. For similar reasons, we refer to widely recognised national and international standards on interoperability and numbering¹³, which all LOs should be familiar with.

Legal context

2.5 The requirements for the display of CLI Data are set out in the CLI Licence Condition which requires LOs, subject to technical feasibility and economic viability, to provide CLI Facilities. It also specifies that the LO must ensure that any CLI Data provided with a call includes a valid, diallable telephone number which uniquely identifies the caller. Where LOs identify a call that

¹² See <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/numbering> for more information.

¹³ Principally NICC (<https://niccstandards.org.uk/>), which has responsibility for UK technical telecoms standards, and the ITU (<https://www.itu.int/en/about/Pages/default.aspx>), which is United Nations specialised agency for information and communication technologies.

has invalid or non-diallable CLI Data, the CLI Licence Condition requires the LO to prevent these calls from being connected to the called party, where technically feasible.

- 2.6 CLI Data is personal data within the meaning of data protection legislation, which in Jersey is set out in the Data Protection (Jersey) Law 2018.¹⁴ This includes the principle that requires personal data to be processed in a manner that ensures appropriate security of the data¹⁵, which in this context requires LOs to respect the privacy choices of end users making and receiving calls.
- 2.7 We may need to make changes to this Guidance from time to time. We will consult on these changes in the usual way as and when appropriate.

Scope

- 2.8 This Guidance applies to all LOs holding a Class II and Class III licence we have issued containing the CLI Licence Condition.
- 2.9 Although LOs are required to comply with the CLI Licence Condition, LOs must also be mindful of the privacy requirements relating to the Connected Line¹⁶, arising from Jersey's data protection legislation. Therefore, we also encourage LOs to follow these principles for Connected Line (COL) information.
- 2.10 We also encourage LOs to reference this Guidance in their interconnect agreements so that their contracting parties also follow them.

Relevant technical standards

- 2.11 The format of telephone numbers is defined by the ITU in their International Public Telecommunication Numbering Plan.¹⁷ This document sets out the structure of telephone numbers and how the numbers should be interpreted.
- 2.12 UK telecoms technical standards agency NICC has developed rules applying to interconnection between UK network providers allowing compliance with regulatory expectations. These rules are set out in ND1016.¹⁸ LOs interconnecting with other LOs should follow these rules wherever possible, although there may be instances where this is not possible.
- 2.13 The allocation of numbers within Jersey, the UK and other Crown Dependencies is administered by Ofcom and set out in the National Telephone Numbering Plan¹⁹, which includes restrictions on how numbers may be adopted or used.

¹⁴ <https://www.jerseylaw.je/laws/enacted/Pages/L-03-2018.aspx>

¹⁵ Section 8 (e) of the Data Protection (Jersey) Law 2018

¹⁶ The Connected Line Identity (COL) represents the information about the called party.

¹⁷ See ITU-T Recommendation E.164 <https://www.itu.int/rec/T-REC-E.164/en>

¹⁸ See <https://niccstandards.org.uk/publications/nd1001-1099/>

¹⁹ See <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/numbering> for more information.

Enforcement

- 2.14 Although this Guidance is not legally binding, we may take it into account in enforcement action against other binding requirements under the Telecommunication (Jersey) Law 2002, including licence conditions.
- 2.15 The Jersey Office of the Information Commissioner (JOIC) has primary responsibility for enforcement against the requirements of Jersey's data protection law.

3 Respecting the privacy choices of end users

3.1 This section sets out the principles for protecting the privacy rights of end users making and receiving calls. Its contents are:

- Privacy rights
- Exceptions to the caller's privacy rights

Privacy choices

3.2 Jersey's data protection legislation places responsibilities on LOs as Controllers when handling CLI Data, which in the context of CLI Data requires LOs to respect the privacy expectations for end users making and receiving calls.

3.3 The expectations of the calling party are that:

- (a) They must be able, using a simple means and free of charge, to prevent the display of their number at the point where their call terminates – this option may be exercised by users on a call-by-call basis and by subscribers on a more permanent basis by preventing the display of CLI Data on all calls made from a particular line.

3.4 The expectations of the called party are that:

- (a) They must be able, using a simple means and free of charge for reasonable use, to prevent the display of CLI Data relating to incoming calls (so that help-lines are able to offer an assurance of anonymity to people who call them).
- (b) Where CLI Data is displayed before a call is established, they must be able, using a simple means, to reject calls where the caller has (i) been given the option of preventing the display of their CLI Data and (ii) deliberately chosen to exercise this option. The service is commonly known as Anonymous Call Reject (ACR).
- (c) Where connected line identification (COL) is in use they must be able, using a simple means and free of charge, to prevent the display to the caller of the actual number to which an incoming call has been connected.

3.5 An additional expectation that arises from the application of general data protection principles is the ability of called end users to render inaccessible received CLI Data that is stored by a LO in a form directly retrievable by an end user. This capability is commonly known as call return/1471 erasure.

3.6 Where a called end user has selected to use Anonymous Call Reject, in accordance with paragraph 6.4(b), the calling end user should be advised as to why the call has been rejected, for example a recorded announcement with an explanation that the call was rejected because

they restricted their CLI. This notification should be provided free of charge to the calling end user.

Exceptions to the caller's privacy rights

- 3.7 Jersey's data protection legislation also sets out certain exemptions relating to the handling of personal data, which in the context of CLI Data allows exceptions where the caller's expectation of being able to prevent the display of their CLI Data can be overridden. These are for calls that are made to the emergency services or to assist relevant authorities in investigating and tracing malicious or nuisance calls.
- 3.8 Privacy expectations may also be restricted in order to safeguard national security, defence, public security and to facilitate the prevention, investigation, detection and prosecution of criminal offences.

4 Requirements for Licensed Operators providing CLI Facilities

4.1 This section sets out the principles for LOs providing CLI Facilities on how CLI Data must be provided and passed through their networks to meet the requirements in the CLI Licence Condition and to respect end users' privacy expectations. Its contents are:

- [Overarching principles](#)
- [Principles for the provision and handling of CLI Data](#)
- [Use of end user's CLI Data within the network](#)

Overarching principles

4.2 Class II and Class III licences we issue (will) contain a CLI Licence Condition that require LOs to provide CLI Facilities and enable them by default unless they can demonstrate that it is not technically feasible or economically viable to do so. CLI Facilities must be provided at no additional or separate fee. The LO must inform its subscribers if CLI Facilities are not available on the service they are providing. We expect LOs to inform their customers at the start of their contract whether they are able to provide the functions of the CLI Facilities and to update their customers where the situation changes.

4.3 The CLI Licence Condition also specifies that when providing CLI Facilities, LOs must ensure, so far as technically feasible, that any CLI Data provided with and/or associated with a call includes a valid, diallable telephone number which uniquely identifies the caller. It also requires LOs to respect the privacy choices of end users. The CLI Licence Condition also requires that, other than in relation to calls to the emergency services, where technically feasible, LOs must take all reasonable steps to identify calls which have invalid or non-diallable CLI Data and prevent those calls from being connected to the called party. For the avoidance of doubt, calls to the emergency services should always be connected, regardless of the validity of associated CLI data.

4.4 The CLI Facilities are the functions supporting the provision of CLI Data with a telephone call. The CLI Data consists of a telephone number and an associated privacy marking. This represents the identity of the party making the call.

4.5 These rules help to ensure that the correct information is made available to end users, where appropriate, and for network functions, such as call tracing. Where a LO is unable to provide CLI Facilities to their customer, they should inform their customer.

4.6 In addition to these principles, this section also sets out where LOs must not have access to their customers' CLI Data, to comply with data privacy rules.

Principles for the provision and handling of CLI Data

- 4.7 The fundamental principles behind the provision of CLI Facilities are those of validity, privacy and integrity. As LOs will need to co-ordinate between different networks to follow these principles, we recommend that LOs refer to industry standards, such as the NICC standard ND1016.
- 4.8 A telephone call may be associated with two numbers, the Network Number and the Presentation Number. The Network Number is a telephone number that unambiguously identifies the line identity of the fixed access ingress to the public telecommunication system. The telephone number that is displayed to an end-user is the Presentation Number representing the identity of the caller.²⁰ The CLI can identify the individual making the call or the organisation that the individual is representing, for example where the individual caller is making a call from a line behind a Private Branch Exchange (PBX).
- 4.9 Every call must be associated with a Network Number, which identifies the source of the call. In many cases, the Presentation Number is the same as the Network Number. In this situation, the LO must be mindful of the requirements for both Network and Presentation Numbers.

A valid, diallable number which uniquely identifies the caller

- 4.10 The CLI licence condition requires that LOs must present a valid, diallable telephone number which uniquely identifies the caller.
- A valid number is one which complies with the International public telecommunication numbering plan (Recommendation ITU-T E.164).²¹ Where a **Jersey number** **UK number**²² is used it must be a number that is designated as a 'Telephone Number available for Allocation' in the National Telephone Numbering Plan²³ and be shown as allocated in the National Numbering Scheme.²⁴
 - A diallable number must be one that is in service and can be used to make a return or subsequent call.
 - A number uniquely identifies the caller (which can be an individual or an organisation) where it is one which the user has authority to use, either because it is a number which has been allocated to the user or because the user has been given permission (either directly or indirectly) to use the number by a third party who has been allocated that number.

²⁰ For the COL, the number that is displayed represents the destination of the call.

²¹ <https://www.itu.int/rec/T-REC-E.164/en>

²² [Which includes those allocated to licensed operators in Jersey, Guernsey and Isle of Man for the purpose of this Guidance.](#)

²³ <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/numbering>

²⁴ The National Numbering Scheme is the day-to-day record of the telephone numbers allocated by Ofcom in accordance with the Numbering Plan. It is published on our website here:
<http://static.ofcom.org.uk/static/numbering/index.htm>

- 4.11 The responsibility to ensure that CLI Data fulfils these requirements falls to all LOs involved in the transmission and interconnection of the call. The checks that a LO may be expected to carry out will vary depending on their role in that call.
- 4.12 It is the responsibility of the originating LO to ensure that the correct CLI Data is generated at call origination. This applies in respect of both the Network Number and the Presentation Number. The Network Number must be one that has been allocated to the originating LO or a number that has been imported into their network. This number identifies the point of ingress for that call. Where a diallable Presentation Number is also provided, the Network Number does not need to be a diallable number.
- 4.13 The originating LO is also responsible for ensuring that the Presentation Number is either a CLI from a number range that has been allocated to the originating network, or seeking assurance from their customer that they are using a CLI that they have permission to use (either because they have been directly allocated that number or have been given permission by a third party who has been allocated that number).
- 4.14 There may be some LOs who offer services where a CLI is not required, e.g. where the call does not originate on a public telecommunication system. On its ingress to a public telecommunication network we would expect CLI Data to be associated with a call. This could be a network number that has been allocated or ported to the LO , so long as the LO is able to uniquely identify the original caller where needed.
- 4.15 For calls originated on networks to which the requirements of the CLI Licence Condition do not apply, e.g. incoming international calls, the responsibility to check the validity of the CLI Data falls on the LO at the first point of ingress to the Jersey network. Where the LO at the point of ingress does not reasonably trust the CLI Data that is being provided, or where CLI Data is not available, the LO should insert a CLI from a range that has been allocated to them for this purpose as a Network Number and mark it as 'unavailable' so that it is not displayed to the call recipient.
- 4.16 Where technically feasible, transit LOs should also ensure that the CLI Data that they pass with a call contains valid and diallable CLI and the terminating LO should present only valid and diallable CLI Data to the end user. For a transit or terminating LO, for calls that have a ~~Jersey number~~ **UK number**²⁵, a valid and diallable CLI is one that has been allocated in the National Numbering Scheme. LOs should also have regard to the recommendations set out in section 5 on Network and Presentation Numbers. For calls with an international number, for the transit or terminating LO, a valid CLI is one that complies with the format set out in the ITU-T numbering

²⁵ Which includes those allocated to licensed operators in Jersey, Guernsey and Isle of Man for the purpose of this Guidance.

plan E.164.15 LOs should check that the CLI has the correct number of digits and is in a suitable format.

- 4.17 In addition to ensuring that CLI Data is populated properly, the CLI Licence Condition also places an obligation on all LOs to take steps to prevent calls that have invalid or non-diallable CLIs from reaching the called party. This means that LOs who have the technical capability should block or divert such calls. For the originating LO, this means they should not initiate calls that have invalid or non-diallable CLIs. Transit and terminating LOs, where they have the technical capability, should stop calls with invalid or non-diallable CLIs (for ~~Jersey calls~~ UK calls²⁶, these are calls using Presentation Numbers that are not from an allocated number range; and for international calls, a number that is not in the correct international format).
- 4.18 Calls can be stopped either through blocking or filtering. Blocking is where the LO, subject to their technical capability, identifies calls with invalid or non-diallable CLI and prevents these calls from being connected to the end user. Alternatively, terminating LOs could provide a call filtering service, where calls with invalid or non-diallable CLI are diverted to a mailbox, so that these calls are not immediately connected to the end user.
- 4.19 There are other ways to prevent calls with invalid or non-diallable CLI reaching the called party. For example, LOs can prevent calls with invalid or non-diallable CLI from being connected to the called party by working with their upstream providers to ensure that any calls that are connected to their network have CLI Data that meets the requirements of the CLI Licence Condition.

Privacy

- 4.20 To satisfy the end user's expectation to prevent the display of their number, the originating provider must provide the correct privacy marking alongside the number. This marking must indicate to the recipient's network that the CLI is:
- Available – where the caller has been given the possibility of preventing the display of CLI Data and has chosen not to do so; or
 - Withheld – where the caller has been given the possibility of preventing the display of CLI Data and has chosen to exercise this option.
- 4.21 Within the network LOs may use other indicators in situations other than the above, such as where it is not possible to offer an end user privacy choices and ensure they are respected.
- 4.22 For calls received from a network outside the scope of these requirements, the LO at the first point of ingress to the Jersey networks is responsible for ensuring that the call signalling reflects Jersey regulation to ensure that caller's privacy expectations are respected. The LO receiving the

²⁶ Which includes those allocated to licensed operators in Jersey, Guernsey and Isle of Man for the purpose of this Guidance.

call at the ingress to Jersey networks can use the same privacy markings as above, but in this context the markings have a different meaning:

- Available – where the CLI Data is deemed to be reliable and the caller has chosen not to prevent the display of their CLI;
- Withheld – where there is an explicit indication that the caller does not wish to make their CLI available to the recipient of the call; or
- Unavailable – where there is an explicit indication that the originating network has restricted the CLI on behalf of the calling party and their CLI should not be made available, or where it is absent, or when the ingress LO has inserted a Network Number into the call as it has deemed the CLI Data presented with the call unreliable.

4.23 It is the responsibility of the LO terminating the call to ensure that CLI Data is only displayed to the end user where the caller has chosen to make this information available and the recipient of the call has chosen not to prevent the display of CLI Data relating to incoming calls.²⁷ For calls that are being passed to networks where these requirements do not apply, the LO at the point of egress should only pass on the CLI Data where the caller has chosen to make this information available and where they have good reason to believe that the LOs in the onward chain will respect the privacy markings. Otherwise, to avoid a caller's identity being displayed to the called party where the CLI information has been classified as 'withheld' or 'unavailable', the CLI information should be deleted at the gateway exchange.

Integrity

4.24 All LOs involved in the transmission of a call should do all that is technically feasible to ensure that the authenticity of the CLI Data is maintained from call origination to call termination. Where this includes a Presentation Number, LOs must consider whether this number is sufficiently authentic and whether further verification is required, subject to technical feasibility. Section 5 sets out some of these scenarios.

Use of end user's CLI Data within the network

4.25 While Jersey's Data Protection Law does not set out specific rules for LOs to help end users manage information relating to their privacy, LOs must also be mindful of the access they have to the end users' CLI Data. They should only use their privileged access to this information where its use is essential to the provision of a telecommunications system.

²⁷ For COL, the originating LO (that is the originating LO for the party initiating the call) is responsible for ensuring that COL data is only presented where the called party has chosen to make this information available.

- 4.26 Therefore, this access should be limited to those staff for whom it is essential, for example for technical management of the network and/or account and, in co-operation with the relevant authorities, for emergency calls and the tracing of malicious calls and similar activities.
- 4.27 LOs must respect the privacy of callers who have elected to prevent the display of their line identities by not exploiting this information for telemarketing or any commercial purpose other than billing and repair.
- 4.28 Furthermore, LOs must ensure that where callers have chosen to prevent the display of their line identities, the Network Number and Presentation Number should not be passed on to a party who is not a LO, unless the LO knows that the missing CLI information is due to a known technical issue, for example the call has originated in a country where CLI data is removed for calls where the caller has restricted the display of their CLI information.

5 Requirements for Network Numbers and Presentation Numbers

5.1 This section sets out the guidance relating to CLI Data. Its contents are:

- [General approach](#)
- [Guidance on the use of Network and Presentation Numbers](#)

General approach

5.2 The CLI that is displayed to the call recipient is the Presentation Number representing the identity of the caller. All calls must also be associated with a Network Number, which identifies the origin of the call. Where the caller has not selected to use a different number for display to the recipient of the call, the Presentation Number will be the same as the Network Number. For the connected line (COL), the number that is displayed to the party making the call represents the destination of the call.

Network Numbers

5.3 The Network Number must be a line identity that comprises a unique E.164 number (or from which that number may be reconstructed) that unambiguously identifies the line identity of:

- the fixed access ingress to, or egress from, a public communications network, i.e. the Network Termination Point (NTP);
- a subscriber or terminal/telephone that has non-fixed access to a public communications network, i.e. the line identity that has been allocated to an individual subscription or terminal/telephone with a non-fixed access to the public communications network; or
- the first known Jersey public communications network (or a node within that network) in the call path. This should only be used where the first known Jersey LO does not reasonably trust the CLI Data that is being provided or the CLI Data is not available. In these circumstances, the privacy marking provided alongside the CLI should be marked as 'unavailable'.

5.4 The authenticity of a Network Number is guaranteed as the number must be one which has been provided by the originating network and it is a number that has been allocated to the originating network provider, or has been ported to the originating provider. This number should not be changed by other LOs in the call path. Where a diallable Presentation Number is also provided, the Network Number does not need to be a diallable number.

Presentation Numbers

5.5 The Presentation Number is a number nominated or provided by the caller that can identify that caller and be used to make a return or subsequent call, and therefore should be a diallable number. There are a number of scenarios generally recognised by the telecoms industry where Presentation Numbers may be provided, as a commercial service, to meet differing customer

calling requirements. ~~Where the party who has been allocated that number gives permission for multiple callers to use that number, we would expect the party allocated the number to keep records of who they have given permission to use the number, to aid in call tracing requests.~~

5.6 Unlike a Network Number, a Presentation Number will not necessarily identify a call's point of ingress to a public network. However, it may carry other useful information. The requirements of a Presentation Number are that:

- It must be a valid number, i.e. be a number which complies with the International public telecommunication numbering plan (Recommendation ITU-T E.164). Where a ~~Jersey number~~ UK number²⁸, it must be a number that is designated as a 'Telephone Number available for Allocation' in the National Telephone Numbering Plan and be shown as allocated in the National Numbering Scheme;
- It must be a diallable number, i.e. a number that is in service and can be used to make a return or subsequent call;
- It must uniquely identify the caller (which can be an individual or an organisation), i.e. be a number that the user has been given authority to use (either because it is a number that has been allocated to the user or because the user has been given permission [either directly or indirectly] to use the number by a third party who has been allocated that number); and
- It must not be a number that connects to a Premium Rate Service (e.g. prefixed 09), or to a revenue sharing number that generates an excessive or unexpected call charge.

5.7 Where additional verification is needed to demonstrate that the caller has permission to use the number, the originating network could demonstrate this in the form of a contract between the caller and the third party who has been allocated that number.

Guidance on the use of Network and Presentation Numbers

5.8 There are a number of scenarios where Presentation Numbers may be provided, as a commercial service, to meet differing customer calling requirements. Examples of different types of Presentation Number are listed below.

Types of Presentation Number

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 –
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²⁸ Which includes those allocated to licensed operators in Jersey, Guernsey and Isle of Man for the purpose of this Guidance.

	<p>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.</p>
Type 2	<p>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.</p>
Type 3	<p>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.</p>
Type 4	<p>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.</p> <p>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.</p>
Type 5	<p>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.</p>

6 Calling Line Identification and calls to the Emergency Services

- 6.1 Licence Conditions require all Class II and Class III provide a Public Emergency Calls service allowing a caller to make a call to the emergency numbers 999 or 112. To aid the 999/112 Call Handling Agent (CHA) with whom they have contracted to process emergency calls, LOs should, for all types of call, provide the Network CLI of the call, which the CHA can use as a reference to aid identifying the caller's location in real-time.
- 6.2 When an emergency call is initiated from their network, LOs should supply the relevant CLI Data and include as a minimum the Network CLI from which the call originated. ~~For the avoidance of doubt, LOs must ensure that emergency calls initiated from their network are routed to a CHA that has been evaluated and approved by Justice and Home Affairs, the Government of Jersey department responsible for providing emergency services in the Island.~~
- 6.3 In cases where an LO receives an emergency call which has an invalid or non-diallable CLI that LO should connect the call (as opposed to blocking or filtering the call as if it were a non-emergency call). That LO should then work with the telecoms network or customer who had initiated the call to ensure that future emergency calls include the necessary CLI. This should apply to all emergency calls: both those from the end-user to the CHA and those from the CHA to the emergency services control room.

Annex 1: Glossary

<p>Anonymous Call Reject (ACR)</p>	<p>Where the called party has opted to reject calls where the caller has chosen to prevent the display of their CLI Data.</p>
<p>Calling Line Identification (CLI)</p>	<p>Calling Line Identification is the data that is provided with a telephone call about the caller. It consists of the caller’s line identity along with a privacy marking, which indicates whether the number can be shared with the recipient of the call.</p>
<p>Calling Line Identification (CLI) Facilities</p>	<p>These are the facilities by which the telephone number of a calling party is presented to the called party prior to the call being established.</p>
<p>CLI Data</p>	<p>CLI Data means the contents of all signalling messages which can be used between Communications Providers and/or between Communications Providers and End-Users to signal the origin of the call and/or the identity of the calling party, including any associated privacy markings.</p> <p>It is comprised of a mandatory Network CLI, an optional Presentation CLI and respective privacy information (which indicates what the call originator is prepared to have displayed to the called party). Privacy information is overridden in the case of calls to the emergency services.</p>
<p>Connected Line Identity (COL)</p>	<p>Connected Line Identity is the data that is provided with a telephone call about the called party. It consists of the called party’s line identity along with a privacy marking, which indicates whether the number can be shared with the caller.</p>
<p>Network Number</p>	<p>The Network Number is a telephone number that unambiguously identifies the line identity of the fixed access ingress to or egress from a Public Telephone Network or a subscriber or terminal/telephone that has non-fixed access to a Public Telephone Network. For CLI, it can also be the first known telecoms network in the call path, where the first known LO does not reasonably trust the CLI Data that is being provided or the CLI Data is not available.</p>
<p>Network Termination Point</p>	<p>This is the physical point at which a subscriber is provided with access to a telecoms network and can be identified by means of a specific network</p>

	address, which may be linked to the Telephone Number or name of a Subscriber.
NICC	NICC is the UK telecoms industry standards forum that develops interoperability standards for UK communications networks
Presentation Number	The Presentation Number is a number nominated or provided by the caller that can identify that caller or be used to make a return or subsequent call. It may not necessarily identify the line identity of the geographic source of the call.

Annex 2: call blocking and/or stopping guidance for LOs

The CLI Licence Condition requires LOs, where technically feasible, to take all reasonable steps to identify calls in relation to which invalid or non-diallable CLI data is provided and prevent those calls from being connected to the called party. There is further guidance in section 7 of this document on what is meant by a valid, diallable telephone number and what transit and terminating providers should consider when identifying calls with invalid or non-diallable CLI.

This annex sets out high level guidance for any LO where they block or stop calls to prevent calls with invalid or non-diallable CLI from reaching the called party.

Process for stopping or blocking calls

Two of the ways a LO could prevent calls with invalid or non-diallable CLI from being connected to the called party are by blocking or stopping calls. There are also other ways that LOs can demonstrate compliance with the requirements of the CLI Licence Condition that do not require stopping or blocking. Therefore, this is not intended to be an exhaustive list of the options.

Process for Stopping calls

“Stopping” calls refers to attempts by a LO to stop any future calls from a known or suspected nuisance caller from entering its network. This is typically achieved by refusing all traffic from a problem CLI, traffic route or interconnecting LO due to previous breaches of contractual prohibitions against nuisance call traffic. In this way, nuisance callers are essentially disconnected from terminating Jersey networks - further calls are stopped "at source" before they can be made. In their contracts with their interconnect partners, and with their originating customers, LOs should include a provision that they will not carry such traffic. When such traffic is identified, LOs will enforce these contractual conditions.

Process for Blocking calls

“Blocking” is applied on a call-by-call basis (in real-time) to calls that have already found their way onto a LO’s network. Calls that have invalid or non-diallable CLI are identified and blocked - that is, the calls are not delivered to their intended recipient. When blocking calls, LOs should take appropriate steps to ensure they do not cause network congestion. This process is typically implemented by LOs through programming their networks to automatically block traffic associated with invalid or non-diallable CLI, including those that matches the condition of malformed or PRS CLIs.

Dispute resolution process

Blocking or stopping calls that have invalid or non-diallable CLI is based on the presumption that legitimate calls have valid CLIs. However, it is possible that some legitimate calls may be blocked when they should not be. LOs should therefore have a process in place to remove the

blocking/stopping in the event of disputes in which the blocking/stopping decision is reasonably rebutted. Where these calls are identified, LOs are encouraged to work with their customers to improve the accuracy of the CLI data. The dispute resolution process should be managed in a timely fashion to limit harm to inappropriately impacted callers. The dispute resolution process should be published on the LO's website, so that it is discoverable by blocked callers or their LOs. It should also be widely communicated within their organisation particularly where queries about blocked calls will be received, such as the customer contact teams.