

Jersey Airtel Limited's (JAL) response to JCRA Case T-036: Guidance on the provision of Calling Line Identification (CLI) Facilities - Proposed Guidance for consultation.

Via Email to JCRA

Please refer to JAL's response in blue below to questions listed in section 3 of the Document No: JCRA 23/01, published on 5 January 2023.

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

JAL welcomes the Authority's initiative to review and establish expectations for the use of CLI facilities in Jersey. Please refer to our comments and concerns listed in response to Question no 3.

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

In addition to the scope defined, suggest the Authority to consider the implementation of a centralised CLI fraud mitigation system to prevent related frauds, as implemented by Ofcom in UK i.e. 'Do Not Originate (DNO) blacklist'.

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

JAL appreciates JCRA's efforts in providing guidance related to CLI facilities, however, request the Authority to consider and clarify regarding the following concerns:

- a. The outbound calls originating from JAL's network are being processed with full CLI facilities, however, JAL does not have the capability to identify and monitor valid/invalid CLI for the calls being received by JAL's network. Therefore, the end to end responsibility to terminate calls with valid and dialable CLI should sit with the operator originating the call.
- b. The Authority needs to define invalid or non-dialable CLI, for an example, calls from A Party having CLIR facility will be non-dialable number for B Party and this document contradicts for both the conditions, please refer to 7.3a and 6.3a in the Document No: JCRA 23/01, published on 5 January 2023.
- c. JAL follows 3GPP TS 29.163 version 8.32.0 Release 8 which conflicts with ND1016 for Network CLI and Presentation CLI to be displayed to end customer (as per 5.12 in the Document No: JCRA 23/01, published on 5 January 2023.). Any modification in this regard will require JAL to make significant capex investment including massive human resource efforts to implement hardware changes in its network without any revenue realisation.
- d. JAL's current infrastructure does not have the capabilities to meet the expectations as defined in 6.4, 6.5 and 6.6 in Document No: JCRA 23/01 respectively, published on 5 January 2023. Any modification in this regard will require JAL to make significant capex investment including massive human resource efforts to implement hardware changes in its network without any revenue realisation.

Jersey Airtel Limited
16th February 2023