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

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Contents

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 Plan[1]. 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 numbering[2], 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

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[1] See https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/numbering for more information.
[2] 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[3]. This includes the principle that requires personal data to be processed in a manner that ensures appropriate security of the data[4], 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 Line[5], 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.[6] 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.[7] 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 Plan[8], which includes restrictions on how numbers may be adopted or used.

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[3] https://www.jerseylaw.je/laws/enacted/Pages/L-03-2018.aspx
[4] Section 8 (e) of the Data Protection (Jersey) Law 2018
[5] The Connected Line Identity (COL) represents the information about the called party.
[6] See ITU-T Recommendation E.164 https://www.itu.int/rec/T-REC-E.164/en
[7] See https://niccstandards.org.uk/publications/nd1001-1099/
[8] 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 an 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.[9] 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, dialable 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).[10] Where a UK number[11] is used it must be a number that is designated as a 'Telephone Number available for Allocation' in the National Telephone Numbering Plan[12] and be shown as allocated in the National Numbering Scheme.[13]

- A dialable 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.

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[9] For the COL, the number that is displayed represents the destination of the call.

[10] https://www.itu.int/rec/T-REC-E.164/en

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

[12] https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/numbering

[13] 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 an 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 UK number[14], 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 8 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 plan E.164.~~15~~ LOs should check that the CLI has the correct number of digits and is in a suitable format.

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

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 UK calls[15], 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

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[15] 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.[16] 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 8 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.

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[16] 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.

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 UK number[17], 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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[17] Which includes those allocated to licensed operators in Jersey, Guernsey and Isle of Man for the purpose of this Guidance.

	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.
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.
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.
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.

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.

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

Anonymous Call Reject (ACR)	Where the called party has opted to reject calls where the caller has chosen to prevent the display of their CLI Data.
Calling Line Identification (CLI)	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.
Calling Line Identification (CLI) Facilities	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.
CLI Data	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. 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.
Connected Line Identity (COL)	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.
Network Number	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.
Network Termination Point	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

	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 an 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.