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EETT offices,
60 Kifissias Avenue,
151 25 Marousi,
Athens, Greece (7th floor),

Response from Access Partnership Ltd to the Public Consultation on guidelines on the provision of the calling line identification service (CLI)

Dear Sir or Madam,

Access Partnership wishes to thank the EETT for the opportunity to respond to the above-mentioned consultation.

About Access Partnership

Access Partnership is the world's leading public policy consultancy for the technology sector, providing public policy and technical expertise to companies operating in, or intersecting with, the technology, data and connectivity sectors.

Among other things, Access Partnership helps companies understand and comply with regulations related to numbering. This includes working with a number of CPaaS (Communications Platforms as a Service) providers¹ and other new entrants in this space. We consider that our experience in the sector places us in a good position to share our perspective with the EETT with the objective of ensuring the guidelines are effective and proportionate.

Should the EETT require more information or wish to discuss these issues further we would be pleased to assist in whatever way we can.

¹ CPaaS is a cloud based technology that enables a business to integrate real-time communications services into its applications without the need for complicated engineering. A CPaaS system can include voice calls, instant messaging, Web based real time communication, SMS and video.

General comments

Access Partnership welcomes the publication of guidelines to help clarify the provision of CLI information in Greece. Additional information is always valuable to reputable companies operating in the numbering area and who wish to comply with the rules. We also believe that the protection of consumers and prevention of fraud is of paramount importance and guidelines that help to achieve this are welcomed.

There are legitimate uses for modifying, blocking or masking CLI information

Access Partnership considers that modifying or masking the content of the CLI can be of value to the end-user/consumer in some instances, helping to ensure safety and privacy. For example:

- In certain applications such as a delivery service the delivery person might need to contact the person buying the goods to find where their specific house is in a block of flats. Neither person needs to see the other's phone number and so protecting each party's identity here when the communication has been initiated through the app is beneficial.
- Certain services such as phone lines for child protection or domestic violence need to mask the CLI to protect vulnerable people who are calling them and could be placed in greater danger if the number they called or were called back from appeared.
- Some customer call centres benefit from having a local number to keep charges down for consumers but the actual call centre is located elsewhere. Being able to use a different CLI here (as long as charges for the consumer match the ones they expect) is beneficial to both consumers and businesses.
- Call centres that make calls on behalf of different businesses can insert an appropriate CLI for a specific call.
- Businesses that have employees in different physical locations can share CLI regardless of where the employees are based.

Based on these examples we would like to suggest that the guidelines provide for a range of legitimate uses of CLI modification when carried out for reasonable purposes.

There should be a high burden of proof before a network provider prevents or blocks calls.

Guideline 9 appears to suggest that network providers should block calls from fictitious/unassigned numbers.

"The network provider prevents routing calls from fictitious / unassigned numbers, insofar as this information is available."

Stopping numbers being used fraudulently is important in helping to prevent consumer harm. However, we believe that there needs to be a very high evidence threshold so that the network provider is certain that the number is indeed being used fraudulently. There is a risk – possibly greater for smaller companies that have small allocations of numbers – that legitimate calls may be inadvertently blocked. Also in situations where a network provider is in competition with a service provider for the provision of certain types of downstream services that use numbers, this requirement could be used to hamper the competitor's services.

We would suggest that the EETT consider proposing and requesting public comment through consultation on the specific rules regarding how a network provider judges whether a number is unassigned or fictitious, and the specific circumstances in which a network provider would be justified in blocking a call.

Yours Faithfully,

Chris Adams
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