Do Not Originate List – Guidance Note for organisations and Application Form

Content

1   Introduction

1.   Many organisations use phone numbers for inbound-only calls to provide a wide variety of services to consumers e.g., banking helplines, reporting lines, call centres. Such numbers are not used by the organisation for making outgoing calls.

2.   Fraudsters sometimes make calls to look like they are coming from these numbers to trick consumers into answering the calls. This is known as "spoofing". As a consequence of call spoofing, consumers may inadvertently divulge personal or financial information.

3.   To address the problem, ComReg is now compiling a list of phone numbers that never make outbound calls. This is called the "Do Not Originate" or "DNO" list. This DNO List is just one of a number of ComReg current and planned interventions to combat nuisance communications.

4.   Organisations can apply to have relevant phone numbers included on the DNO List. Numbers to be included on the DNO List are those used for inbound-only calls, that are at a high risk of being spoofed and where the potential for consumer harm is high. Examples of numbers that could be included are numbers in use by government departments or agencies, banks and financial institutions.

5.   **Any number that your organisation may use to make outgoing calls should not be added to the DNO List.**

6.   Please note that adding a number to the DNO List will not affect your customers calling the number.

7.   The DNO List will be provided on a monthly basis to telecoms operators who will block calls purporting to be from numbers on the list as these calls are fake.

8.   ComReg expects that implementation of a DNO List in Ireland will lead to a reduction in nuisance calls to consumers.

9.   Nevertheless, it should be noted that ComReg may not be able to include all requested numbers in the DNO List, as some operators may have limitations on the volume of numbers they can block on their networks. Therefore, if required, ComReg may restrict the size of the DNO List.

10.   ComReg will only accept applications for numbers to be added to or removed from the DNO List from the organisation that has been assigned those number(s). Requests from representative bodies or parties working on behalf of the organisation will not be accepted.

11.   ComReg reserves the right to revise this Guidance Note and Application Form.

2   Before applying to the DNO List

12.   Before requesting to add a number to the DNO List organisations should consider the following:

- That the number is used for inbound-only calls i.e. no genuine calls are made from the number by the organisation.

- If the number is publicly advertised and if consumers are aware of it.

- If the number is at high risk of spoofing e.g. helpline numbers used by bank customers.

- The number of consumers that could be affected by spoofing of the number.

- The potential level of risk to consumers from spoofing of the number.

- If any scam activity using the number has previously been reported.

13.   Applicants will need to explain the rationale for requesting numbers to be added to the DNO List and confirm that they have contacted their telecoms operator to check that their organisation will not be impacted if the number is blocked from making outgoing calls.

14.   ComReg will consider applications to the DNO List and decide whether to include a number based on the rationale and/or nature of the request.

3   Adding numbers to the DNO List

15.   Review the section 'Before applying to the DNO List" and consider if the number is suitable to submit to ComReg for addition to the DNO List.

16.   Complete the DNO List Application Form in Annex 1 of this document, which requires organisations to:

- gather relevant information to enable ComReg to assess whether the number should be added to the list. Include rationale with your DNO application to explain the reasons and/or nature of the request to add a number to the DNO List.

- nominate a "responsible person" and provide email and telephone contact details for same within your organisation. This person will be the main contact point for ComReg in relation to the DNO application and should be familiar with and understand the DNO process. The responsible person:

  o must be authorised to make applications to the DNO List on behalf of your organisation.

  o will need to ensure that all relevant parts of your organisation have signed off on the number(s) being added to the DNO List, in accordance with your organisation's approval process.

  o will need to make a declaration when submitting the number(s) to the DNO List.

- nominate and provide email and telephone contact details for at least one secondary contact. This person will be contacted in relation to the DNO application process if ComReg is unable to get in touch with the responsible person.

17.   Complete the "DNO Request Form" in Annex 2. A guide to the completion of this form is provided in Section 5 below.

18.   Email the completed DNO Application Form and completed DNO Request Form together to dno@comreg.ie.

4   Removing Numbers from the DNO List

4.1   Normal Procedure to restore a number

19.   Where numbers previously provided to ComReg for inclusion on the DNO List need to be unblocked and restored to service, organisations should complete the DNO List Application Form in Annex 1 and "DNO Removal Form" in Annex 3.

20.   Email the completed forms together to [dno@comreg.ie.](mailto:dno@comreg.ie)

21.   The request to remove the number(s) and restore it to service will be sent with the following month's DNO List i.e. it will not be immediate.

4.2   Emergency Procedure to restore a number to service

22.   Where the restoration of a number to normal service is urgent, an email marked URGENT DNO EMERGENCY RESTORE REQUEST should be sent to dno@comreg.ie.

23.   ComReg will inform telecoms operators of the emergency restore request by email within 24 hours (working days only).

24.   Operators will restore (i.e. unblock) the relevant numbers to service within 24 hours where possible.

5   Format of Data

25.   In terms of the format of data to be submitted when requesting the addition or removal of numbers from the DNO List (Annex 2 or 3):

- Where listing more than one sequential phone number, please list each number individually and provide the range. For example, if listing numbers 120, 121, 122 and 123, you should note both the following: - '120, 121, 122, 123' and '120-123'. This will assist ComReg in identifying and processing the numbers.

- Do not put any spaces between the numbers within a phone number.

- If listing more than one number, please provide the list of numbers in order of priority (in the event of limitations to the DNO List).

- Ensure "+353" or "00353" or "353" is removed from the beginning of the numbers. All numbers should start with a "0".

- Explanations of the fields are below:

   o **CLI** - the Calling Line Identity (CLI), or phone number, to be added or removed from the DNO List. If there is more than one number, the CLIs should be entered in sequence, from the highest (at top of column) to the lowest priority (bottom of column).

   o **Explanation** – justification to have CLI added to or removed from the DNO List.

   o **Date of DNO request**- the date of the request to add a number(s) to the DNO List.

   o **Date of DNO removal request**– the date of the request to remove a number(s) from the DNO List.

   o **Requestor** - the name of the applicant (organisation) and number holder.

- Check for duplicate entries and remove if needed.

6   DNO List Submission Procedure

26.   Organisations should submit all applications for DNO additions or removals to dno@comreg.ie before the 20th of the month (or the next working day, in cases where the 20th falls on a weekend) for inclusion in the DNO List for that month.

27.   ComReg will issue operators with the DNO List following receipt of submissions by 20th of the month.

28.   The DNO List will be issued via secure email to nominated operator contacts and will be password protected.

29.   If applications are received after the 20th of the month, ComReg may not add the numbers to or remove the numbers from the DNO List until the following month's update. This is because the ComReg approval process can take several days, depending on the nature of the application and the checks to be undertaken.

30.   ComReg will assess and decide if a number should be added to or removed from the DNO List.

31.   ComReg will inform applicants if the numbers requested for addition to the DNO are unsuitable for inclusion.

Annex 1: DNO List Application Form

If you wish to add or remove numbers from the Do Not Originate list, please:

1. Complete the DNO List Application Form below.
2. Detail the numbers to be added or removed from the DNO List in the DNO Request Form or DNO Removal Form below, as appropriate
3. Email the completed DNO List Application Form and the DNO Request Form or DNO Removal Form, as appropriate, together to dno@comreg.ie.

Do Not Originate List Application Form	Please complete this column
Organisation Name	
Organisation Address	
Responsible person	
Name	
Job title	
Email address	
Telephone number	
Secondary contact person	
Name	
Job title	
Email address	
Telephone number	

Declaration

I have followed the necessary approvals in my organisation prior to submitting the DNO List Application Form and the DNO Request Form or DNO Removal Form.

I have checked with our telecoms operator and confirm that my organisation and any associated entities will not be impacted when the number(s) are added to the DNO List and blocked from making outgoing calls (Only applies to DNO request, not removal).

I am fully authorised to submit the DNO List Application Form and DNO Request Form or DNO Removal Form on behalf of:

_____

(Organisation Name)

Signature: _____

Name in Block Letters: _____

Organisation Name: _____

Date of submission: _____

Annex 2: DNO Request Form

CLI (in order of priority)	Explanation	Date of DNO Request	Requestor

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Annex 3: DNO Removal Form

CLI (in order of priority)	Explanation	Date of DNO Removal Request	Requestor