



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulat

Formation of the Nuisance Communications Industry Forum

Information Notice

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Additional Information

Document Name	ComReg Reference & Link
Combatting scam calls and texts: Response to Consultation on network-based interventions to reduce the harm from Nuisance Communications	ComReg 24/24
Europe Economics' response to submissions to Consultation 23/52	ComReg 24/24a
Plum Report: Report on the deadlines for implementation of ComReg's proposed interventions to combat nuisance communication	ComReg 24/24b
Know Your Customer (KYC) Guidance Document – Draft	ComReg 24/24c
Combatting scam calls and texts: Overview of the Response to Consultation	ComReg 24/24d
Consultation on Combatting Nuisance Communications	ComReg 23/52

Overview

1. ComReg is establishing an industry action group to address the growing menace of scam calls and texts. This cross-industry body will be called the Nuisance Communication Industry Forum (“NCIF”) and will convene its first meeting in June 2024.
2. The NCIF will assist industry in implementing the Decision Instruments (“DIs”) published in conjunction with ComReg’s response to consultation document 24/24 (“ComReg 24/24”).
3. These DIs mandate a package of interventions with various deadlines for deployment, which aim to reduce the damaging effects of nuisance communications¹ on Irish society.
4. The NCIF’s main initial objectives will be to develop detailed technical specifications for interventions that have not already been specified by industry, and to prepare implementation plans for the interventions that align with the requirements in the DIs. Some interventions (e.g. the SMS SenderID Registry) will also require a communications plan to be prepared.
5. ComReg will provide assistance to the NCIF and will ensure it is adequately and appropriately resourced by procuring organisational, secretarial and if necessary technical expertise to aid and support effective implementation.
6. A draft Terms of Reference will be provided to participants to be discussed and agreed at the first meeting.

¹ Nuisance communications, for the purposes of this Information Notice, means unwanted, unsolicited communications generally directed at large groups of the population. Nuisance communications often have the intent to mislead the receiver, so that they unknowingly provide sensitive personal information. This in turn can enable the criminal to perpetrate fraud.

ComReg Document 24/24 and Accompanying Decision Instruments

7. Irish society and its economy have become ever more reliant on telecommunications technology. It is integral to our daily lives and affects all areas of the economy and society. Unfortunately, our use of electronic communications networks and services is being exploited by criminals, who use social engineering type attacks – for example vishing, smishing and CLI spoofing, with the intention of illegally acquiring personal consumer information, ultimately to abet financial fraud.
8. ComReg is actively working with the telecoms industry to mitigate the scourge of scam calls and texts in Ireland and to restore trust in telecommunications services and the national numbering scheme. To this end, ComReg published its Response to Consultation 23/52 and seven Decision Instruments on 3 April 2024 (ComReg 24/24).
9. ComReg 24/24 codifies a package of interventions which ComReg considers will best mitigate the ongoing scourge of scam calls and texts. ComReg formed this view in light of the relevant material before it, including, among other things:
 - responses to Consultation 23/52 (published document 24/24s);
 - the ComReg commissioned Europe Economics' Report (Document 23/52a); and
 - the surveys conducted by B&A of Irish consumers (Document 23/52b) and businesses (Document 23/52c) on ComReg's behalf.
10. The interventions described in the DIs have been deployed in other countries, providing convincing evidence of their effectiveness with notable declines in the rates of scam calls and texts. When deployed in Ireland, this package of counter measures will reduce scams and their harm, protect consumers and help restore trust in electronic communications services.
11. Plans (as outlined in this document) are now being progressed to establish a new cross industry body to help ensure the timely and proper implementation of the technical interventions set out in the following Decision Instruments:
 - **Decision 09/24:** Do Not Originate ("DNO").
 - **Decision 10/24:** A Protected Numbers ("PN").
 - **Decision 11/24:** Fixed CLI Call Blocking.
 - **Decision 12/24:** Mobile CLI Call Blocking.

- **Decision 13/24:** A Voice Firewall.
 - **Decision 14/24:** Sender ID Registry.
12. In tandem with this work, ComReg also recently published updates to the Numbering Conditions of Use and Application Process document² which ComReg considered necessary to enable the mandated package of interventions to combat scams.
 13. In addition to these measures, ComReg proposed a draft Know Your Customer (KYC) guide for operators that would assist them in reducing the risk of scammers being erroneously assigned numbers. This consultation³ is currently open⁴, closing on 31 May 2024. ComReg will publish a final KYC Guidance document after reviewing and considering consultation responses.

Nuisance Communications Industry Forum

14. Consumers, civil society, and governments are rightly concerned by the snowballing of scam calls and texts and the ensuing damaging effects on public confidence in the integrity and trustworthiness of electronic communications. Urgent action is required by all stakeholders to help combat this menace.
15. Given the complexity of this work, a co-ordinated cross industry approach is needed to combat this scourge and reduce the devastating impact of scam calls and texts on Irish consumers and society. This can be best achieved by ensuring the measures and target dates set out by the DIs are met.
16. To this end, ComReg will establish a Nuisance Communications Industry Forum (“NCIF”) to oversee the mandatory implementation of DIs by industry.
17. This new Forum will build on the important work of the previous Nuisance Communications Industry Taskforce (“NCIT”) which was a discussion-focussed group tasked with identifying and implementing interventions on a “best-efforts” approach.
18. The NCIF will be composed of a Steering Group and two technical working Sub-Groups.

² <https://www.comreg.ie/publication/numbering-conditions-of-use-and-application-process-3>

³ <https://www.comreg.ie/publication/know-your-customer-kyc-guidance-document-draft>

⁴ <https://www.comreg.ie/publication/extension-of-the-consultation-period-for-document-24-24c-titled-know-your-customer-guidance-draft>

1.1 Steering Group

19. An overarching Steering-Group will be responsible for helping to ensure the timely and successful implementation of the nuisance communications Decision Instruments by industry. The Steering Group will provide terms of reference and guidance to the two technical working Sub-Groups who will report as matters arise, and on their implementation progress. The Steering Group will also consider more general matters concerning efforts to combat scam calls and texts.
20. ComReg will engage an independent chair and secretary to lead and coordinate the Steering Group. Meetings are expected to take place monthly and will be held virtually.
21. The technical working Sub-Groups will consist of an SMS Sub-Group and a Voice Sub-Group (detailed below).
22. The Steering Group may request either Sub-Group to consider other matters from time to time, as they relate to scam calls and SMS texts to address any emerging or remaining vulnerabilities that scammers could exploit.

1.2 SMS Technical Sub-Group

23. The Sub-Group will discuss and progress through the work needed for the implementation of the interventions as guided by the chair. The Sub-Group will agree objectives, prepare detailed implementation and communications plans, co-ordinate industry's efforts to meet project plan deliverables, draft technical specifications, oversee intervention launch, monitor progress and provide feedback to the Steering Group.
24. The SMS Technical Sub-Group will initially focus on the implementation of a new SMS Sender ID Registry ("Registry"), in line with **Decision 14/24**. The aim of the Registry is to **restore and maintain consumer trust in SMS** with over 2 billion SMS messages sent annually in Ireland. ComReg will present a proposed design and project plan to industry for comment and discussion.
25. The implementation timeline for the Sender ID Registry is short and requires close cooperation and coordination between telecoms operators and aggregators (providers that issue bulk SMS on behalf of organisations). ComReg therefore considers it important that the SMS Technical Sub-Group starts work without delay.

- 26. The Registry will consist of a database of Participating Aggregators (PAs)⁵, Sender ID Owners (SIDOs)⁶ and associated Sender IDs, and will reside in a secure online environment, with access restricted to authorised users.
- 27. Once fully implemented, the only SMS messages bearing an alphanumeric Sender ID which will be transmitted to end users will be those that have been registered for the sender’s exclusive use with ComReg. Recipients can then be assured of the legitimacy of the SMS messages they receive. A high-level view of the SMS Sender ID Registry project is shown in Figure 1.

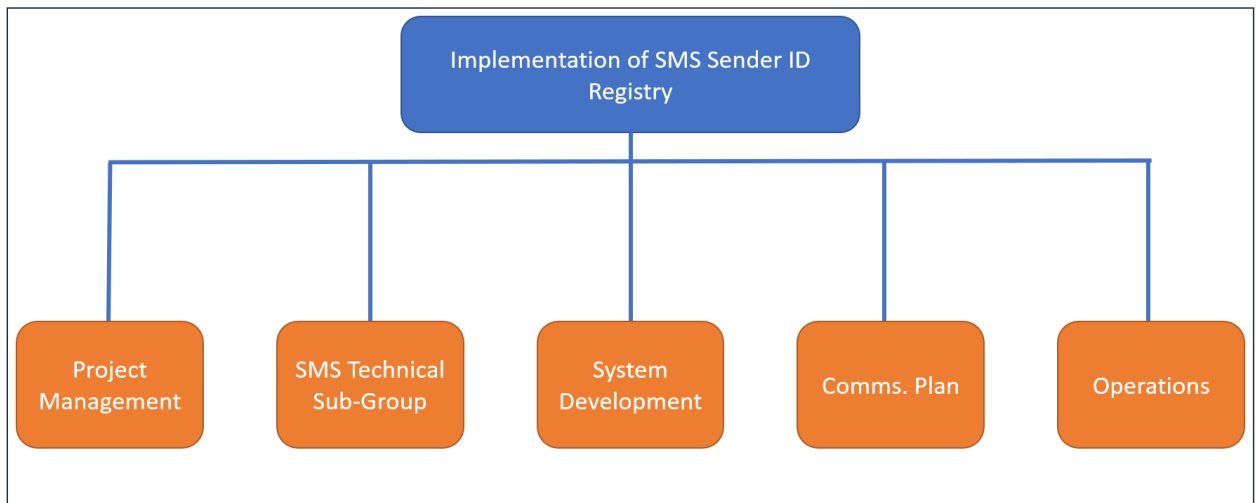


Figure 1: SMS Sender ID Registry project overview

- 28. Tasks of the SMS Technical Sub-Group will include:
 - **Agree and publish implementation and communications plans for the Sender ID Registry:** This will include tasks for ComReg, Participating Mobile Service Providers and Participating Aggregators (“PAs”), as well as the timings for same. As crucial contact points for SIDOs, PAs will need to inform them about the Registry and how to register Sender IDs in time so that they will not be blocked upon full implementation. Consumers will also need to be informed of upcoming changes to SMS messages arising from the implementation of the Registry. In this regard ComReg envisages running several communications campaigns. The communications plan will set out the relevant target audiences, key messages, channels, and timings for communications on the SMS Sender ID Registry.

⁵ PAs are authorised businesses capable of sending batch SMS messages on behalf of organisations or businesses.

⁶ Businesses and organisations that use Sender IDs in the SMS they send to their customers.

- **Coordinate and oversee the implementation of the SMS Sender ID Registry** at all stages from design and development of the Registry, through the “sunrise” and “transition” phases to full implementation of the SMS Sender ID Registry (see Figure 2).

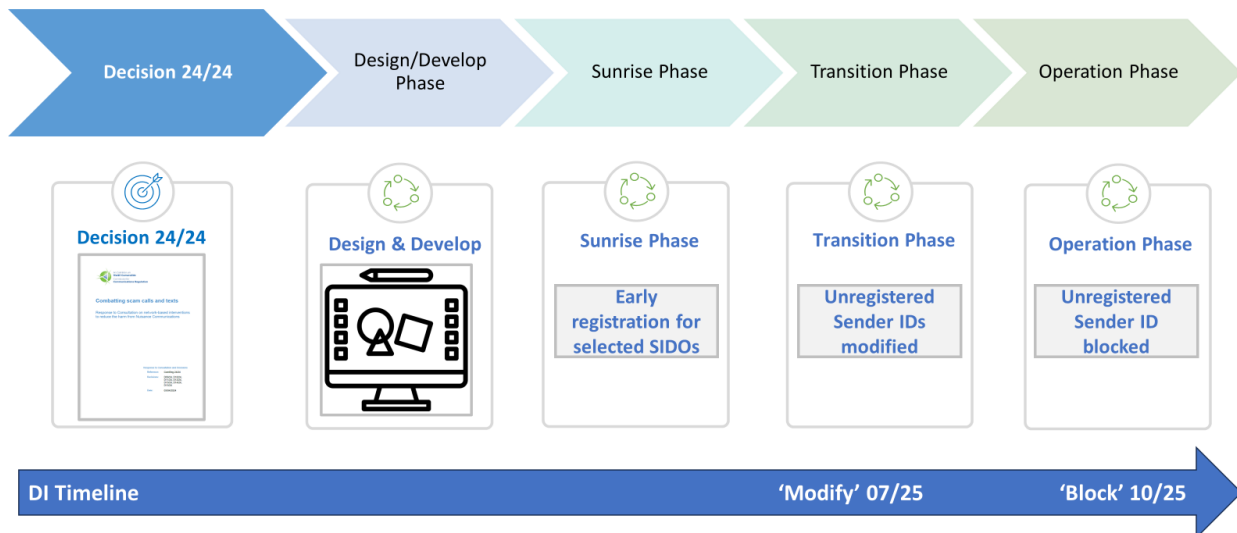


Figure 2: SMS Sender ID Registry phases

29. This Sub-Group may also need to consider any interventions or measures that may arise from the SMS Scam Filter consultation that ComReg aims to publish during the summer of 2024.⁷
30. ComReg will engage an independent chair and secretary to lead and coordinate the Sub-Group’s activities. Meetings will be held as and when required, initially fortnightly with meeting frequency being revisited as the project advances. All meetings will be virtual.
31. ComReg looks forward to fruitful discussions at the SMS Technical Sub-Group and calls for industry’s full and active engagement in developing and implementing the important and innovative SMS Sender ID Registry.

⁷ Refer to section 1.5.2 “Scam SMS Consultation” in ComReg Document 24/24

1.3 Voice Technical Sub-Group

32. The Sub-Group will discuss and progress through the work needed for the implementation of the interventions as guided by the chair. The Sub-Group will agree objectives, prepare detailed implementation and communications plans (if required), co-ordinate industry's efforts to meet project plan deliverables, draft technical specifications, oversee intervention launch, monitor progress and provide feedback to the Steering Group.
33. The Voice Technical Sub-Group will primarily focus on the implementation by operators of each of the voice centred DIs:
 - **Decision 09/24:** Do Not Originate ("DNO").
 - **Decision 10/24:** A Protected Numbers ("PN").
 - **Decision 11/24:** Fixed CLI Call Blocking.
 - **Decision 12/24:** Mobile CLI Call Blocking.
 - **Decision 13/24:** A Voice Firewall.
34. Industry will need to agree certain technical specifications regarding the implementation of the Voice DIs and provide these to the Steering Group for consideration.
35. ComReg will engage an independent chair and secretary to lead and coordinate the Sub-Group's activities. Meetings will be held as and when required, initially fortnightly with meeting frequency being revisited as the project advances. All meetings will be virtual.
36. ComReg looks forward to fruitful discussions at the Voice Technical Sub-Group and calls for industry's full and active engagement.

Invitation to Participate

37. This invitation to participation is open to all members of the electronic communications industry, who are keen to cooperate and combat scam calls and texts.
38. Membership of the NCIF is limited to persons employed by organisations who have and operate within the State under a General Authorisation⁸ and carry voice calls and/or SMS messages.
39. Attendees of the Steering Group should be persons:
- who agree to attend on behalf of their organisation to constructively contribute and actively participate in the activities of the NCIF;
 - who have authority to agree to common positions, where necessary.
40. Attendees of the Technical Sub-Groups should be persons:
- who are network specialists within their organisation, with knowledge of the operation of electronic communications networks and services,
 - who agree to attend on behalf of their organisation to constructively contribute and actively participate in the activities of the NCIF.
41. In responding to this invitation, the industry organisations should submit:
- the name(s) of the individual(s) to represent them at the NCIF meetings;
 - the name of the group they wish to attend (Steering, SMS Sub-Group, Voice Sub-Group)
 - the competence, knowledge and experience they can bring to the activities;
 - their job functions/title; and
 - their email address.
42. Proposed attendee details should be submitted to NCIF@ComReg.ie by **12:00 hours on Thursday 30th of May 2024**.

⁸ Under Section 4 (1) of the European Communities (Electronic Communications Networks and Services) (Authorisation) Regulations 2011 (S.I. No. 335 of 2011), any person intending to provide an electronic communications network or service shall, before doing so, notify the Regulator of his intention to provide such a service.

43. The first Steering Group and Sub-Group meetings are expected to be held in mid June 2024. Participation will, at all times, be subject to competition law rules.
44. ComReg will issue details of the Group meetings – including access details, to registered participants in due course.
45. In the event that parties have any comments or queries please email NCIF@ComReg.ie