



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Nuisance Communications

Update on the Nuisance Communications Industry Taskforce

Information Notice

Reference: ComReg 22/77

Version: 1.0

Date: 30/09/2022

1. Ireland is increasingly reliant on telecommunications technology. It is deeply integrated into all areas of the economy and society; however, this constant in our lives comes with its own threats and vulnerabilities. Fraud, which can be perpetrated by using electronic communications networks and services (and particularly nuisance communications¹), has, for some perpetrators, become a low-risk² form of crime. The reduced cost and increased availability of means to perpetrate these crimes has seen this type of fraud rise substantially in Ireland. Our daily use of electronic communications networks and services is exploited by criminals, who use social engineering type attacks - for example vishing, smishing and Calling Line Identification (“CLI”) spoofing, with the intention of illegally acquiring personal consumer information, ultimately to abet financial fraud.
2. At its heart, this fraud is the abuse of telecommunications services with the intention of illegally acquiring money. Criminals prey on our daily use of electronic devices and continuously seek out new ways to exploit vulnerabilities and access information. The reduced cost and increased availability of hacking equipment means this type of fraud is regrettably on the rise.
3. The latest available Central Statistics Office (“CSO”) publication on crime indicates that nuisance communications continue to grow. While the data relates to fraud more broadly, and not solely to fraud conducted via nuisance communications, the CSO notes that the 90% year-on-year increase in 2021 was “*largely driven by unauthorised transactions and attempts to obtain personal or banking information online or by phone*”³, matching similar experiences abroad.
4. Aware of the damaging effects and complexity of nuisance communications, and the pressing need for a cross-industry effort to combat the problem, ComReg, in December 2021, announced the formation of the Nuisance Communications Industry Taskforce (“NCIT”)⁴. The NCIT held its first meeting under an independent Chair in February of this year. In addition to ComReg itself, there are fifteen industry members who collectively carry the bulk of calls and SMS messages that are delivered to Irish users:
 - BT Ireland
 - Blueface
 - Colt

¹ Nuisance communications for these purposes means: means unwanted, unsolicited communications generally directed at large groups of the population.

² The reduced cost and increased availability of hacking equipment, including that this type of crime more often than not originates outside the jurisdiction making the chances of detection and prosecution slim.

³ Please see the CSO’s latest statistical release on crime in Ireland “Recorded Crime Q1 2022” accessible here <https://www.cso.ie/en/releasesandpublications/ep/p-rc/recordedcrimeq12022/>

⁴ See ComReg Information Notice 21/129 at https://www.comreg.ie/?dln_download=nuisance-communications-formation-of-the-nuisance-communications-industry-taskforce

- eir
- Imagine Communications
- Intellicom
- Magnet
- Sky Ireland
- Tesco Mobile
- Three
- Twilio
- Verizon
- Viatel
- Virgin Media
- Vodafone

5. The NCIT brings together representatives of the telecommunications industry to, amongst other things:

- discuss potential interventions to be applied to networks to minimise/mitigate the volume and effect of nuisance communications;
- develop an implementation roadmap to ensure that the interventions are implemented by the appropriate network and/or service providers as quickly as possible in line with the expected timelines of the deliverable of the taskforce; and
- facilitate an effective means for industry to collaborate and share information over the long term should nuisance communications evolve or should a network/networks come under a sustained nuisance communications attack.

6. NCIT success requires the support and expertise of the entire telecommunications industry, including international gateway providers, and the strong endorsement of its work by the CEO's⁵ concerned. ComReg readily accepts that it is these companies who operate and run Ireland's telecommunications networks and therefore have the greatest concentration of know-how and resource needed to tackle this problem.

7. ComReg notes that the Minister of State for Communications, Minister Ossian Smyth, has expressed a keen interest in the work that ComReg and industry are doing to combat nuisance communications, and ComReg thanks the Minister and the Department of the Environment, Climate and Communications for their continuing and active support in relation to this matter.

⁵ To that end, CEOs of NCIT member organisations have signed a Code of Conduct that commits members to uphold that and the NCIT Terms of Reference.

8. Following seven taskforce meetings, several interventions have been scoped and high-level technical specifications agreed which, when implemented, should notably lessen the quantity of nuisance communications currently being experienced in the State. ComReg notes:
- The implementation phase of the NCIT is underway, with operators now free to proactively deploy interventions;
 - A Do Not Originate (“DNO”)⁶ trial is underway with the assistance of relevant organisations; and
 - Each intervention design encompasses the gathering of metrics to help evaluate and monitor the effectiveness of the intervention.
9. Given the extent of the fraud and the damaging effect it is having on trust of Irish telecommunications services, NCIT members should now be fully focused on speedy implementation and accelerated deployment of these interventions. ComReg understands from its bilateral engagements with operators that most are committed to the deployment of applicable interventions.
- For the voice related interventions, the onus is now on both the international gateway and mobile operators to give priority to the accelerated deployment of these interventions. These interventions are urgently required to block telephone calls originating from fraudsters.
 - For the SMS related interventions, ComReg continues to await the engagement of certain organizations that utilise sensitive senderIDs⁷, who need to put in place system changes to allow the mobile operators to secure those SMS senderIDs from spoofing and abuse. Separately, ComReg urges the mobile operators to commence planning and design of the agreed SMS spam filter solution.
10. The NCIT has been working at pace to tackle the scourge of nuisance communications. Appropriate regulatory underpinning has not been overlooked however, and to that end ComReg aims to launch a major policy consultation in

⁶ Many organisations use phone numbers for inbound-only calls to provide a wide variety of services to consumers. Fraudsters sometimes originate calls to look like they are coming from these numbers to trick consumers into answering the calls, This is an activity known as spoofing. To address the problem, ComReg has now compiled a Do Not Originate” or “DNO” list, comprising phone numbers that are never used for outbound calls and so can be blocked by operators.

⁷ An SMS senderID is an alphanumeric source address used by some organisations when sending SMS messages to their customers.

early 2023. Work is now underway on this, and ComReg has contracted with Europe Economics⁸ and Behaviours & Attitudes⁹ to aid in its robust development.

11. Going forward, further proactive work will be required by the telecommunications industry to address other, more complex vulnerabilities and to help stymie new or evolving types of nuisance communications. Such tasks may include, but are not limited to:

- a gap analysis to identify further measures that may be taken, including more dynamic interventions.
- proactive monitoring of trends in nuisance communications both in Ireland and abroad;
- formalising inter-operator and cross-sector cooperation and coordination;
- identifying actions for industry and ComReg to raise consumer awareness of scams;
- ultimately, developing an overarching long-term national strategy to combat nuisance communications; and
- contributing to international regulatory initiatives to promote an international approach, as appropriate.

12. The focus for ComReg and the NCIT is to restore trust in our telecommunications services by putting in place interventions to reduce the prevalence of the damaging effects of nuisance communications and their impact on Irish consumers and society.

13. ComReg looks forward to the continuing work of the NCIT in the months ahead, together with the full and active commitment of all its members and other interested parties. Nuisance communications is facilitating fraud against Irish consumers and businesses which impacts on the commercial and social activities of our country.

⁸ Europe Economics is a leading economics consultancy providing trusted economic analysis and advice to some of the most well-known and respected national and international firms and organisations.

⁹ Behaviour & Attitudes is a leading Irish market research company, offering a comprehensive suite of tailor made quantitative and qualitative methodologies and advice on all aspects of consumer behaviour and its implications.