



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Combating scam calls and texts

Overview of the Response to Consultation

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1 Lárcheantar na nDugaí, Sráid na nGildeanna, BÁC 1, Éire, D01 E4X0.
One Dockland Central, Guild Street, Dublin 1, Ireland, D01 E4X0.
Teil | Tel +353 1 804 9600 Suíomh | Web www.comreg.ie

1. Scam calls and texts are a blight on Irish society and cause significant financial and economic damage to all sectors of society including consumers, business, and public bodies. Scams also diminish the trust placed by consumers and businesses in both calls and SMS. The prevalence of scam calls and SMS has increased in recent years, with the vast majority of mobile users having received one or both.
2. In response, ComReg launched a public consultation in June 2023 which provided the first detailed insight into the serious harm caused by scam calls and texts. The frequency of scam calls and texts in Ireland is stark. **Over 90 per cent** of adults in Ireland have received a scam call to their mobile phone, **while 84 per cent** have received some form of scam text. The most impersonated organisations are banks along with postal and courier services but followed closely by the HSE and other government services.



3. The research and modelling commissioned by ComReg indicates that in 2022 alone there were:
 - approximately **365,000 cases of fraud as result of scam calls and texts, (or 1,000 cases a day)**
 - up to **89 million annoying/irritating communications and 31 million distressing communications.**
 - over **5,000 businesses that were the victim of fraud** after receiving scam calls and texts
4. Overall, the total quantifiable harm to Ireland's society arising from scam calls and texts is conservatively estimated at **over €300 million per annum.**
5. In order to combat this menace, ComReg's consultation proposed a package of interventions.

- **Do-Not-Originate list:** Allows businesses/organisations to secure their numbers by blocking those numbers not used to contact consumers and prevents scammers from spoofing these numbers¹.
 - **A Protected number list:** To stop fraudsters using numbers that are not yet in service or have yet to be allocated to a telecoms operator prior to entering service.
 - **Fixed CLI Blocking:** To stop fraudsters abroad spoofing Irish geographic numbers (e.g., 01-xx) to make scam voice calls.
 - **Mobile CLI Blocking:** To stop fraudsters abroad spoofing Irish mobile numbers (e.g., 087-xx) to make scam voice calls.
 - **Voice-firewall:** To block spam calls wherever they arise (i.e., Ireland or abroad) and protect against future more sophisticated scams.
 - **A SMS ID Registry:** Allows businesses/organisations to register a SMS Sender ID² while blocking those that are not on the Register.
6. Given the scope of the proposed interventions and at the request of industry, ComReg provided a total of 10 weeks for responses to its consultation and also an opportunity for interested parties to request clarification on any aspect of these interventions.
 7. ComReg received responses from a wide variety of stakeholders, including fixed and mobile operators, solutions providers, trade associations, banking and payment operators and multinational operators among others with widespread acceptance of the serious harm caused by scam calls and texts.
 8. ComReg's proposed package of interventions was also broadly welcomed. Some concerns were raised, relating to the justification for certain interventions (e.g., voice firewall) and how some interventions (e.g., Sender ID Registry and Mobile CLI) would operate in practice. With that in mind, ComReg has provided further clarity around the necessity for the interventions and made some adjustments to provide for their effective and flexible implementation.
 9. Notwithstanding the voluntary measures taken by some operators³, ComReg is of the view that a package of network-based interventions must be implemented across the industry. This package has been designed, mindful that scammers will

¹ CLI means 'calling line identification' and here refers to the number displayed on the receiver's handset.

CLI spoofing refers to where the CLI has been faked by a fraudster and appears to be a call from a genuine number or business. In effect, it appears that an incoming call is coming from a local number that is already known and trusted to the receiver.

² The SMS Sender ID is the text display that you see at the top of your phone's screen and is typically used to identify who sent the message. Sender ID spoofing occurs when the number or name as displayed on a recipient device's screen has been faked by a fraudster and appears to be a SMS from a genuine business or organisation.

³ The PN and DNO lists are already up and running and some operators have implemented the Fixed CLI intervention. These have blocked around 19 million scam calls to date. Unfortunately, not all operators have implemented these relatively straightforward measures which will now be mandated along with other interventions.

invariably try to find new ways of targeting consumers and businesses. Importantly, any package of interventions must be cognisant of fraudsters ability to switch across scams, platforms, and territories. Therefore the package also includes dynamic interventions such as a voice firewall which can be updated in real time to account for fraudsters' ever-adapting strategies.

10. ComReg cannot proceed with the proposed SMS Scam Filter intervention at this time due to a lack of legislative basis. However, it will instead commence a separate consultation during the summer to consider other options that could be used to address SMS scams. Consideration of these options is all the more important as other English-speaking countries have already introduced full SMS Scam Filters while some other EU countries such as Belgium, Poland and Spain have either introduced scam filters or are planning to do so.
11. ComReg estimates that the overall benefit of the current package of interventions once implemented **is around €1.2 billion over the next seven years**. When combined, ComReg's package of interventions should bring around **€55 euros in economic and social benefit for every €1 spent by operators securing their networks** to reduce the rate of scam calls and texts. It is now for operators to implement the interventions which have timelines of between 6 and 24 months.
12. Helpfully, ComReg notes that Mr. Torlach Denihan of the Telecommunications Industry Ireland ("TII") – IBECs representative body for the electronic communications industry in Ireland, recently confirmed⁴ on national television that *"we are awaiting a decision from ComReg ... once we hear from them, once we get the greenlight, we will implement with maximum haste those interventions"*. ComReg welcomes this positive industry statement and hopes that operators will now act with appropriate haste. With this in mind, ComReg will reformulate its Nuisance Communication Industry Taskforce (NCIT) to primarily focus on the early introduction of the full suite of interventions.
13. Readers are referred to Document 24/24 and its Executive Summary for further information.

⁴ RTE1, Upfront With Katie Hannon – 18 December 2023