



*Non-Confidential Version*

***Consultation: Terms and Conditions for the Provision and Use of Network Functions Identification of the Caller's Line, Connected Line Identification and Tone Dialling***

*Twilio's Response to the Review by Commission for Regulation of Communications Bulgaria*

5 November 2021



## 1. About Twilio

- 1.1 As a leading global Communications Platform as a Service (**CPaaS**) provider, Twilio provides services to more than 235,000 enterprises globally and powers more than 1 trillion interactions between them and their customers every year.
- 1.2 Twilio's software allows customers to communicate with their customers over voice, SMS, messaging, or email thanks to the communications feature that companies have added into applications across a range of industries, from financial services and retail to healthcare and non-profits.
- 1.3 For instance, Twilio powers the communications for New York City's contact tracing initiative. The services enable city authorities to communicate with COVID-19 patients, educate them on the virus, and identify their close contacts through self-reporting. The platform also provides messaging-based alerts using Twilio Voice, SMS, email or WhatsApp that prompt patients to fill out secure surveys on their symptoms.
- 1.4 In Europe, Twilio serves a number of global customers as well as Government organisations and many of Twilio's customers are also small and medium-sized enterprises and Twilio's social impact arm, [Twilio.org](https://www.twilio.org), supports charitable organizations to deliver their communications needs.

## 2. Executive Summary

- 2.1 Twilio welcomes the opportunity to provide feedback on the Commission for Regulation of Communication's (**CRC**) consultation on draft rules on the terms and conditions for providing and using network functions "caller line identification", "caller ID", the connected line and "tone dialling" (**Draft Rules**).
- 2.2 Calling line identification (**CLI**) is key to our customers and the communications platform as a service we provide them. Our customers rely on calling line identification to identify themselves to the persons they call and message. Parties receiving calls and messages want to know that the person that is calling and messaging them are who they say they are. Our customers view telephone numbers as an important identifier that supports their businesses and brands. Twilio is acutely aware that in order for our customers' businesses and brands to flourish, trust in telephone numbers is required by the entire ecosystem - businesses that make calls and send messages, persons that receive calls and messages and electronic communications services providers that facilitate these exchanges.
- 2.3 Twilio is committed to ensuring trust in telephone numbers. In this regard, Twilio sits on the board of the Alliance of Telecommunications Industry Solutions (**ATIS**) and co-chairs the Robocalling and Communication ID Spoofing Group, which has been coordinating work on the implementation of the STIR/SHAKEN protocol in the United States of America. The rules around how CLI can be used are therefore extremely important to Twilio's customers and Twilio is pleased to have the opportunity to comment on these draft rules.



- 2.4 As set out below in its response, Twilio supports the flexible use of CLI. It respectfully encourages the CRC to consider adopting a more flexible approach to CLI than that which is currently suggested by Articles 6(1) and (2). Twilio believes that there are benefits to customers and industry alike by allowing a caller to use a CLI other than one provided by the originating operator provided that the originating operator has verified that the customer has the right to use that CLI.
- 2.5 Twilio notes that this approach is supported by the Electronic Communication Committee (ECC) of the European Conference of Postal and Telecommunications Administrations (CEPT).<sup>1</sup>
- 2.6 In addition Twilio notes the requirement to display CLI regardless of the callers choice to calls made to the emergency, defence, security and internal order services. Twilio suggests that while it is clear what numbers fall within the scope of emergency calling it is not clear how extensive the list of called numbers for the other three categories of services are and therefore Twilio suggests that it would be useful to list out the relevant numbers in an annex.
- 2.7 Please do not hesitate to refer any questions or remarks that may arise as a result of our comments to:

Twilio Ireland Limited  
Address: 25-28 North Wall Quay, Dublin 1 Ireland  
Attention: Twilio Global Regulatory Affairs  
Email: regulatory-notices@twilio.com

### **3. Twilio's Comments**

#### **A. Prohibition on Using CLI on alternative providers**

- 3.1 Twilio notes that Articles 6(1) and (2) provide as follows:

*The identification of the caller line (CLI) shall be generated by the electronic communications network from which the call originates and shall contain the caller number and the number indicator.*

*Notwithstanding the voice service technology used, the CLI should display without change the number of the caller provided to it for use by the undertaking.*

- 3.2 Read together these provisions appear to prohibit the use of a CLI that has not been provided to the customer by the electronic communications service or network provider operator that is

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<sup>1</sup> See <https://docdb.cept.org/download/1262>



originating the call. Twilio is concerned that such an approach is not only detrimental to innovation and competition but also fails to take into account the conclusions put forward by the ECC as discussed further below.

3.3 Many of Twilio's customers use CLIs that have been provided by other carriers and carriage service providers in conjunction with Twilio's CPaaS services. Such customers include:

- financial institutions that use Twilio's CPaaS platform for fraud alerts in conjunction with CLIs that correspond to telephone numbers that have been assigned to the financial institution by other electronic communications service or network provider as these are telephone numbers that their customers recognise;
- companies that provide mass notification services that automate and accelerate organizations' operational response to public safety threats such as severe weather conditions, IT outages, terrorist and cyber-attacks or other incidents. Mass notification companies allow their customers, which include some of the largest cities, airports and financial institutions in the world, to quickly and reliably aggregate and assess threat data, locate people at risk and allow responders to assist by automating the execution of predefined communications processes through different communication channels. These services use CLIs provided by other electronic communications service or network provider in conjunction with the Twilio CPaaS services; and
- organizations such as hospitals that require alternative routes to continue to make and receive calls using the CLI provided by other electronic communications service or network providers in the case of network failure by the provider of the CLI.

3.5 Twilio notes that the use of a CLI provided by other carriers and carriage service providers is endorsed by the Electronic Communication Committee of the European Conference of Postal and Telecommunications Administrations in EEC Report 248 entitled Evolution in CLI - decoupling of rights of use of numbers from service provision.<sup>2</sup> The report considers that increased flexibility in CLI use promotes greater customer empowerment. The report also notes that the flexible use of CLI does not lead to greater amounts of spoofing if appropriate validation measures are implemented. As stated in the report:

*Spoofing can occur only when you have a party in the calling chain that has malicious intent and this is independent of the flexible use of CLI.*

CEPT recommends allowing flexible use of CLI provided that alternative service providers ensure that an end user has the right to use the number on a regular basis by mandating validation techniques.

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<sup>2</sup> See <https://docdb.cept.org/download/1262>



- 3.6 Twilio encourages CRC to consider adopting a more flexible approach to the use of CLI as recommended in the ECC report which would allow customers to use a number that has been provided to them by one electronic communication network or service provider as the CLI on a call through another electronic communication network or service provider provided that the originating provider validates that a customer has the implemented validation techniques.

**B. Disclosure of CLI on calls to the security, defence and internal order services.**

- 3.7 Twilio notes that article 25 of the Draft Rules provides that “ in the case of calls to emergency services, as well as calls to the security, defence and internal order services, undertakings shall provide the CLI, irrespective of the setting made by the end user.” Twilio notes that it is common practice for the CLI of calls to the emergency services to be displayed, regardless of the settings chosen by the user. However it is less common in other jurisdictions for this requirement to extend to such services as the “security, defence and internal order services”. In light of this fact, Twilio respectfully suggests that a list of numbers that would fall within these categories of “security, defence and internal order services” would be a welcome addition as part of an annex to the rules so that providers have an complete and accurate list of all numbers they need to display the CLI of calls to,, over and above those to the emergency services.