



# Consultation response: Numbering Plan - Amendments

10th February 2025



## Introduction

Twilio is a global Communications Platform as a Service (CPaaS) provider. Twilio's CPaaS products allow businesses to communicate with their customers over voice, SMS, messaging, and email with communications features that companies have added into applications across a range of industries. Twilio offers cloud communications services that enable software developers to build, scale, and operate real-time customer engagement, into web and mobile applications.

Today, Twilio powers more than one trillion interactions every year and helps its more than 300,000 customers—from small businesses to the world's largest multinational companies, as well as industries including education, healthcare, manufacturing, public safety, financial services, and many more—reinvent how they engage with their customers or constituents.

## General Comments

Twilio welcomes the opportunity to comment on the draft numbering regulations. While we appreciate the goals of the consultation, we are concerned about several aspects of the proposals.

We kindly suggest that the SPRK considers extending the date of implementation an additional 6 months (ie October 1, 2025) so that all providers have adequate time to implement the updated regulations.

## Comments on Section 1.1

Twilio is concerned that SPRK may inadvertently be placing unnecessary restrictions on the use of numbers, both in terms of where those numbers are used (extraterritorially) and how those numbers are obtained

The amendments introduce restrictions that may limit the ability of electronic communications service providers to operate effectively in the Latvian market. In particular, the emphasis that numbers must be obtained from spectrum holders (MNOs), or only with explicit consent from a local network operator, creates a potential barrier to entry and expansion, and raises serious concerns that this could disadvantage new entrants and emerging technology operators vis-a-vis



incumbents in the marketplace, to the detriment of competition, the EU internal market, and end-user interests. Without a clear mechanism to ensure fair access to numbering resources, providers such as Twilio may be left with no viable way to offer services in Latvia. Flexibility is needed to ensure that network-independent startups and new entrants have the ability to continue to provide the services demanded by businesses and consumers.

In addition, a restriction on extraterritoriality in the interest of preventing fraud or scams should not be applied without necessary exceptions in place to protect legitimate use cases often emerging from innovation and evolution of technology and its uses. Twilio notes that there are legitimate reasons why mobile numbers are in demand for originating calls from abroad. For example, there are cases in which legitimate organisations operating 24/7 find it necessary to use numbers hosted abroad: to ensure availability to make and answer calls, and to be more efficient with costs and deliverability. Legitimate CPaaS use cases for presenting CLIs with the caller or sender being located abroad include (company-internal and external) call centres providing support for Latvian customers, and cloud-based conferencing platforms dialling out to include additional participants, etc. There are also legitimate use cases for using temporary CLIs, for instance to ensure that subsequent calls are properly answered, to protect the identity of both the caller and called individual etc. Users wishing to make calls or to send messages with Latvian CLIs may also include government agencies, non-government organisations, charities, etc.

Twilio therefore believes there should be opportunities for exemptions from any suggested blocking measures (including industry measures) in an effort to support legitimate use cases. Any measures, be they industry agreed, regulatory in nature, or even legislative in nature, should not result in hampering innovation, restricting competition or negatively affecting important end-users.

### **Comments on Section 1.7**

The proposal to prohibit incoming international calls to short codes, additional payment service numbers, and split payment service numbers may have unintended consequences for global service providers. Many international businesses rely on short codes for customer support hotlines, transaction authentication (such as one-time password SMS delivery), and other critical



communications. The inability to receive calls from abroad from these numbers could force providers to migrate services to geographic numbers, potentially increasing costs and causing inconvenience to customers. Additionally, multinational companies that operate in Latvia and other markets simultaneously may find it more difficult to standardize their customer support channels if short codes are restricted in this manner.

Alternative solutions have been introduced in other jurisdictions, such as Do Not Originate (DNO) lists. These are widely used fraud prevention measures where originating operators block calls that should never originate from certain numbers on a list that is managed by the regulator generally. This method effectively prevents scammers from spoofing legitimate numbers to impersonate businesses or government agencies. Under this approach, businesses can list numbers that will never initiate outbound calls and which are at risk of spoofing as well as other numbers such as one-way inbound-only customer support hotlines, government helplines, and emergency services, on a designated list. Carriers and service providers would then be required to block any calls that originate from these numbers. This measure can address the issue of scammers spoofing numbers to deceive victims, while still allowing legitimate international calls to reach the intended recipients. By adopting this approach, fraud can be effectively mitigated without imposing unnecessary restrictions on lawful communications. Ireland and the UK have established such DNO lists and Belgium and Spain are considering introducing such lists.

### **Comments on Section 1.8**

Twilio welcomes the introduction of the 120X short code and the potential for new opportunities to provide services to the Latvian market.

### **Comments on Section 4.0**

Before proceeding with an auction system for numbering rights, Twilio urges SPRK to gather additional stakeholder input on the types and ranges of numbers that could be auctioned in order to ensure a more transparent process. Twilio also urges consideration of the limitations new entrants and small companies may encounter in an auction and recommends putting in place measures to ensure a fair and robust process.