FIRST ORION
TRANSPARENCY IN COMMUNICATION

October 7, 2019

Via Electronic Submission

EX PARTE NOTICE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59

Dear Ms. Dortch:

On October 3, 2019 Jennifer Glasgow (by phone), Kent Welch (by phone) and the undersigned of First Orion Corp. ("First Orion") met with representatives from the Consumer and Governmental Affairs Bureau and the Wireline Competition Bureau.

The discussion focused primarily on the Commission's stated goal of measuring "the effectiveness of efforts of the Commission and industry to thwart illegal robocalls and empower consumers" as stated in the *Declaratory Order and Third Further Notice or Proposed Rule Making* released June 7, 2019 (at 87). First Orion shared its views on defining effectiveness as well the types of data that would be helpful in such an evaluation.

From First Orion's perspective, critical factors in defining effectiveness include:

- The number of consumers and businesses that are actually benefiting from call treatment tools and services (Coverage);
- The level of call traffic being treated and with what degree of accuracy (Performance); and
- The level of satisfaction with the performance of the various tools and of efforts to bring greater transparency to "good calls" (Customer Satisfaction).

First Orion also stated that allowing providers to provide data based on their particular analytics and deployment models (rather than some type of standardized approach) would be sufficient to support an effective evaluation and also cautioned that interpreting performance measurements

would be challenging and would evolve over time. First Orion noted the need for more active participation from call originators and also suggested the Commission consider the confidential nature of some of the data that may be requested and afford protection that may encourage sharing of data.

                                        Respectfully Submitted,

                                        /s/ John Ayers

                                        John Ayers
                                        VP Corporate Development

Attachment: First Orion Corp. Presentation

cc: Zach Champ
            Connor Ferraro
            Heather Hendrickson
            Karen Schroeder
            Kurt Schroeder
            Mark Stone
            Kristi Thornton

Industry Measurements

Coverage / Performance / Satisfaction

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Measurements

1st Priority: Subscriber Coverage

2nd Priority: Protection Performance

3rd Priority: General Subscriber Satisfaction

Reduce Risks from Scam Calls and Offer Tools to Manage Unwanted Calls

Industry Goals and Priorities

1) **Coverage:** Increase subscriber access to and use of scam and unwanted call protection tools (of all kinds);

2) **Performance:** Improve performance of call protection tools for subscribers and call originators (e.g. minimize false positives **and** false negatives); and

3) **Satisfaction:** Increase general transparency about who's calling and why and provide tools to manage calls.

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Measurements

1st Priority: Subscriber Coverage

2nd Priority: Protection Performance

3rd Priority: Subscriber Satisfaction

Coverage Goal (relatively straightforward)

- **Goal:** Increase subscriber access to and use of call protection tools (of all kinds)

- **Measures:** (for free and paid features)
  - Percent of all **subscribers** with various scam and other call treatment tools
    - e.g. Labeling, Blocking, Send to VM, etc.
    - *Let each provider define their own breakout*
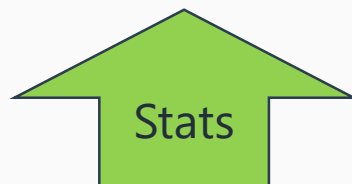
  Stats → **Desired Outcome:** Percent covereage grows toward 100% (where applicable)

- *Note: Also need Subscriber education about all the various available call treatment tools.*

Statistics for Coverage Goal (measures to consider)

Carrier/App	Subscriber Coverage Analysis		Illustration Only			2019
			Q1	Q2	Q3	Q4
Subscriber Coverage Statistics	Label	Free/ Paid	Coverage	Coverage	Coverage	Coverage
Total Subscribers with Labeling & Blocking Features			100.00%	100.00%	100.00%	100.00%
- Subs with Scam Labeling Features	Scam	Free	100.00%	100.00%	100.00%	100.00%
- Subs with Scam Blocking Features	Scam	Free	100.00%	100.00%	100.00%	100.00%
- Subs with Nuisance Category Labeling Features	Nuisance	Free	37.33%	45.10%	48.30%	46.67%
- Subs with Nuisance Category Blocking Features	Nuisance	Paid	75.67%	78.33%	79.20%	80.00%
- Subs with Other Category Labeling Features	(Telemktg, etc.)	Free	59.00%	61.67%	63.50%	63.33%
- Subs with Other Category Blocking Features	(Telemktg, etc.)	Paid	75.67%	78.33%	79.70%	30.00%

Performance Goal (much more complex)

- **Goal:** Improve performance of scam protection tools for subscribers and call originators (e.g. minimize false positives **and** false negatives)

- **Measures:**
  - Percent of **all calls** with various scam and other call treatment
    - e.g. Labeling, Blocking, SHAKEN/STIR, Send to VM, etc.
    - *Let providers define their own breakout*

Stats

Stats

Outcome: Measuring improved performance depends on a combination of factors

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Measurements

1st Priority: Subscriber Coverage

2nd Priority: Protection Performance

3rd Priority: Subscriber Satisfaction

Statistics for Performance Goal (measures to consider)

Carrier/App	Call Performance Analysis		Illustration Only			2019
			Q1	Q2	Q3	Q4
Call Performance Statistics	Label	Free/ Paid	Performance	Performance	Performance	Performance
Calls Labeled & Blocked						
Calls Blocked by Network (eg. DNO)			1.30%	1.25%	1.22%	1.21%
Total Calls Labeled & Blocked for/by Subs			93.54%	93.87%	94.55%	95.22%
- Calls Labeled Scam for Subs	Scam		26.78%	28.04%	29.03%	29.54%
- Scam Calls Blocked by Subs	Scam		9.28%	9.98%	10.04%	10.23%
- Calls Labeled Nuisance for Subs	Nuisance		14.32%	13.98%	15.23%	15.99%
- Nuisance Calls Blocked by Subs	Nuisance		5.72%	5.94%	6.01%	6.13%
- Calls Labeled Other Categories for Subs	(Telemktg, etc.)		52.23%	54.22%	55.32%	56.24%
- Other Category Calls Blocked by Subs	(Telemktg, etc.)		2.30%	2.55%	2.87%	3.01%
Other Statistics						
Reported False Positives			0.000214%	0.000205%	0.000198%	0.018300%
Reported False Negatives			0.000278%	0.000231%	0.000221%	0.000218%
Number of Registered Call Originators			2503	2843	3527	4299
STIR/SHAKEN						
Total Calls Signed by Carrier			60.71%	64.44%	70.86%	73.95%
- A Attestation			35.71%	36.88%	39.24%	40.32%
- B Attestation			17.86%	18.25%	21.40%	22.31%
- C Attestation			7.14%	9.31%	10.22%	11.32%
Total Calls Authenticated by Carrier			52.86%	58.21%	61.25%	65.32%

Challenges for Measuring Performance

Measurements

1) Subscriber Coverage

2) Scam Protection Performance

3) Subscriber Satisfaction

Q: Does increase in calls identified as Scams mean
- a) The analytics are improving (false negatives decreasing).
- b) The total number of scams calls are increasing.
- c) The false positives are increasing.
- d) Some or all of the above.

Q: Does decrease in calls identified as Scams mean
- a) The total number of scams calls made are decreasing.
- b) The analytics are deteriorating (false positives increasing).
- c) The false negatives are increasing.
- d) Some or all of the above.

Q: What does a decrease in B Attestations mean?

Q: What does an increase in C Attestations mean?

Q: What does an increase in registered call originators mean?

Stats ????

Stats ????