

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	

REPLY COMMENTS OF NEUSTAR, INC.

Neustar, Inc. (“Neustar”) submits these reply comments in response to the comments filed by other parties in response to the *Public Notice* released on August 10, 2018 in the above-referenced proceeding.¹ The purpose of Neustar’s comments is assist the Commission in refreshing the record regarding efforts to identify and block illegal robocalls.

I. Background

Serving as the North American Numbering Plan Administrator, the Thousands-block Pooling Administrator and, until recently, the Local Number Portability Administrator, Neustar has long been recognized for its expertise in telephone numbering issues. In addition to its numbering administration experience, Neustar is also the country’s largest provider of Caller Name (“CNAM”) information for Caller ID displays.

Neustar is committed to using its experience with telephone numbering and its involvement with Caller ID to work with the Federal Communications Commission (“FCC”), the

¹ Public Notice, FCC, *Consumer and Governmental Affairs Bureau Seeks To Refresh the Record on Advanced Methods To Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, DA 18-842 (CGAB rel. Aug. 10, 2018) (“*Public Notice*”).

Federal Trade Commission (“FTC”), and the telecommunications industry to combat illegal robocalling and Caller ID spoofing. To that end, in comments in response to an earlier Consumer and Governmental Affairs *Public Notice*, Neustar described some of its products and activities in the area.² In particular, Neustar discussed its role as the exclusive operator of the ATIS Robocalling Testbed,³ and its suite of Trusted Call Solutions – Robocall Mitigation, Certified Caller, and Caller Name Optimization/Branded Call Display – that are designed to help both service providers and enterprises mitigate illegal robocalls.

II. Neustar’s Trusted Call Solutions

Neustar has long taken the position that only objective criteria such as those set out in the Commission’s *Call Blocking Order*⁴ last November should be the basis for service provider blocking of telephone calls.⁵ The four cases authorized for blocking in that order – invalid, unallocated, unassigned, and do-not-originate telephone numbers – necessarily must be illegal robocalls and thus should be prevented from reaching end users whenever possible. In other cases, however, although some calls may have characteristics that make them appear to be illegal robocalls, there is high risk that legitimate traffic may be blocked as well. To avoid that result, Neustar believes it is better to use the Caller ID system to provide information to consumers regarding suspicions about a call. Armed with information, consumers can make the determination for themselves whether to answer a call that is labeled as SPAM or FRAUD. Many consumers will let calls so labeled roll to voice mail, where legitimate callers can leave a

² See Neustar Comments, filed July 2018, *Consumer and Governmental Affairs Bureau Seeks Input for Report on Robocalling*, DA 18-638, CG Docket No. 17-59 (Jun. 20, 2018)(“*July Public Notice*”).

³ <https://www.home.neustar/atis-testbed/index.php>

⁴ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9706, 9727 (2018) (*Call Blocking Order*).

⁵ See, e.g., Neustar Comments, CGB Docket 17-59, July 3, 2017, at 11.

message to be called back. In this manner, rather than being blocked erroneously, legitimate but mislabeled calls will be received by the consumer.

Neustar's Robocall Mitigation solution uses its pre-existing, centralized Caller ID infrastructure to help service providers inform consumers of suspect calls by employing data science, analytics and the guidance of the Commission's *Call Blocking Order* to identify illegal robocallers and alert consumers to such calls via a CNAM overlay, e.g., "SPAM?_NAME," or "FRAUDULENT CALL." While many robocall mitigation apps are available only for wireless services, Neustar's is available to the 850 landline service providers that utilize Neustar's Caller ID service.⁶

In addition to this service, though, Neustar recognizes the concern of businesses that their legitimate calls may be blocked or mislabeled by robocall mitigation services.⁷ In examining this issue, Neustar has conducted over a hundred analyses for legitimate enterprises. For telephone numbers used in legitimate high volume business calling campaigns, Neustar discovered that a significant percentage of these legitimate calls were overlaid with some version of 'spam' labeling by current analytics companies.

To help remedy this situation, building on its nationwide Caller ID hub, Neustar's Caller Name Optimization/Branded Call Display service allows verified businesses to register valid outbound telephone numbers and to manage the corresponding Caller ID display to consumers, e.g., name, logo, call purpose. The service also allows verified businesses to submit their inbound-only telephone numbers as do-not-originate numbers. Neustar utilizes its centralized position in the CNAM ecosystem to distribute both legitimate and do-not-originate telephone

⁶ See, Press Release, Verizon, SPAM? Verizon gives you a new tool to avoid those pesky robocalls with a new Caller ID feature, April 16, 2018, available at <https://www.verizon.com/about/news/block-spam-robocalls-with-verizon-new-tool>. (last visited October 5, 2018.)

⁷ Encore Capital Comments at 1; PRA Group Comments at 1;

number data to a wide net of mobile operators and analytics companies across the communications ecosystem. This process has proven to be highly effective as a single source for service providers, enterprises and consumers to share critical call information.

With more than 100,000 enterprise telephone numbers currently enrolled in this program, Neustar's distribution of verified business call information contributes to understanding and promoting legitimate business calling practices, while mitigating false positive labeling by analytics providers. In practice, this solution provides verified 'blacklisting' and 'whitelisting' capabilities across multiple industry interests.

As part of these efforts, Neustar has partnered with a major nationwide enterprise and seven of the largest analytics companies to further prove the efficacy of a centrally managed industry solution built upon the existing Caller ID infrastructure. In this study, Neustar is managing the enterprise's telephone number and naming data, and acting as the centralized data clearinghouse, both in distribution of the data to the analytics and mobile operator ecosystem, and in consuming and normalizing analytics feedback to the enterprise. This pilot began on Monday, September 17th and is expected to continue for up to sixty days. Neustar believes that adjustments can be made by both call originators and carriers/analytics companies to improve the illegal robocall mitigation process while avoiding false positives for legitimate calls. The goal of the pilot is to gather data to help drive improved policies and procedures that are fair and acceptable to all parties.

III. Traceback with STIR/SHAKEN

In the Public Notice, the Commission asked how STIR/SHAKEN will affect traceback.⁸ Only Comcast responded to this question.⁹ Like Comcast, Neustar believes SHAKEN/STIR,

⁸ *Public Notice* at 3.

⁹ Comcast Comments at 7.

once substantially deployed across VoIP networks, will significantly streamline the traceback process. The signing (authenticating) party for a call can be identified in near-real-time by the verifying party. The verifier will further have an opaque Origination Identifier to help the signing party (who assigned this identifier) better isolate where a particular call may have originated. Over time, Neustar believes that a streamlined process can be defined, adopted and automated to a much greater extent than today.

IV. CONCLUSION

Neustar appreciates the opportunity to submit these reply comments. Neustar looks forward to working with the Commission and the telecommunications industry in combatting illegal robocalling and will continue working to protect the legitimate traffic of enterprises.

Respectfully submitted,

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