

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

In the Matter of	)	
	)	
Advanced Methods to Target	)	CG Docket No. 17-59
And Eliminate Unlawful Robocalls	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97

**GSMA REPLY COMMENTS ON ILLEGAL ROBOCALLING**

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The GSMA<sup>1</sup> respectfully submits these reply comments to the Federal Communications Commission’s (FCC or Commission) in response to Further Notice of Proposed Rulemaking (FNPRM).<sup>2</sup> The GSMA supports the overall aim of these proceedings to protect consumers from these illegal robocalls, otherwise known as ‘nuisance and scam’ calls.

While the US was unfortunately an early victim, illegal robocalls and scams are on the rise globally. Countries around the globe are pushing forward parallel efforts to address robocalls.<sup>3</sup> It is therefore in the interest of all Voice Service Providers (VSPs) to find ways to address the issue in conjunction with regulators and governments. The GSMA believes that education will continue to play a vital role in robocall abatement, both in the US and abroad. As an early leader, the FCC should do more to educate its overseas counterparts on its efforts to protect consumers from robocalls and encourage provider adoption of robocall mitigation practices.

In recent months, the GSMA’s US operator members have worked diligently to reach out to their partners so that their foreign-originating traffic would be certified in the Commission’s Robocall Mitigation Database (RMD). In support of this endeavor, the GSMA also worked to educate its members around the world on the “Foreign Provider Prohibition” and the RMD through its regional and global working groups, including the

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<sup>1</sup> The GSM Association (“GSMA”) ([www.gsma.com](http://www.gsma.com)) represents the interests of mobile operators worldwide, uniting more than 750 operators with almost 400 companies in the broader mobile ecosystem, including handset and device makers, software companies, equipment providers and internet companies, as well as organisations in adjacent industry sectors. Headquartered in London, GSMA North America is located in Atlanta, GA.

<sup>2</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Fifth Further Notice of Proposed Rulemaking in CG Docket 17-59 and Fourth Further Notice of Proposed Rulemaking in WC Docket No. 17-91, FCC 21-105, Rel. Oct. 1, 2021 (*FNPRM*).

<sup>3</sup> See e.g., Unsolicited Communications, Infocomm Media Development Authority, Singapore, <https://www.imda.gov.sg/for-community/Infocomm-regulation-and-guides/unsolicited-communications>.

GSMA's WAGREE<sup>4</sup> working group responsible for the development and maintenance of agreement templates, service level agreements (SLAs) and industry arbitration that underpin international roaming.

During this member outreach process, several overseas-based GSMA mobile network operators, who would qualify as 'foreign voice service provider' (VSPs), raised concerns over their ability to participate in the database due to the traceback requirement. Participation in the RMD requires foreign registrants to certify that they will "respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls."<sup>5</sup> These foreign VSPs are concerned that their national mobile network licence conditions and/or privacy laws would not allow them to fully participate in traceback requests originating outside their borders without guidance or approval from their own national authorities. For example, providing the specified information in Bangladesh or India may be an infringement of a VSP's license obligations.<sup>6</sup>

The GSMA believes that further FCC collaboration with its foreign counterparts is required to help ensure broader participation in tracebacks through the entire call path. International cooperation will be key to solving the issue of illegal robocalling at a global level. The FCC is already part of the Unsolicited Communications Enforcement Network (UCENet) of international regulators, which coordinates information and intelligence-

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<sup>4</sup> The GSMA's WAGREE (Wholesale Agreements) working group meetings cover the commercial aspects of international roaming, including arbitration, fraud, quality and marketing. The WAGREE working group is also responsible for the development and maintenance of agreement templates, service level agreements (SLAs) and industry arbitration.

<sup>5</sup> Robocall Mitigation Database

<sup>6</sup> See, e.g., Regulatory and Licensing Guidelines for Invitation of Proposals/Offer for Issuing License for Establishing, Operating and Maintaining 4G/LTE Cellular Mobile Phone Services in Bangladesh, Section. 41, Subscriber Confidentiality, available at [http://www.btrc.gov.bd/sites/default/files/notice\\_files/Regulatory%20and%20Licensing%20Guidelines%20for%20Invitation%20of%20ProposalsOffers%20for%20Issuing%20License%20for%20Establishing%2C%20Operating%20and%20Maintaining%204GLTE%20Cellular%20Mobile%20Phone%20Services%20in%20Bangladesh.pdf](http://www.btrc.gov.bd/sites/default/files/notice_files/Regulatory%20and%20Licensing%20Guidelines%20for%20Invitation%20of%20ProposalsOffers%20for%20Issuing%20License%20for%20Establishing%2C%20Operating%20and%20Maintaining%204GLTE%20Cellular%20Mobile%20Phone%20Services%20in%20Bangladesh.pdf). See also, <https://cis-india.org/internet-governance/blog/privacy/privacy-telecommunications>.

sharing to combat nuisance calls and unsolicited messaging. Similarly, the FCC's MOU with the Australian Communications and Media Authority have the potential to support a global approach to addressing illegal robocalls.<sup>7</sup> Relationships such as this are the cornerstone of cross-border cooperation. Additionally, the GSMA believes that full and timely cooperation with the Industry Traceback Group is in the best interest of Voice Service Providers, both foreign and domestic, in order to root out bad actors on global networks. Exclusion of these otherwise willing participants is not in the best interest of the RMD or the proliferation of call authentication practices.

Finally, the GSMA is currently working on a platform solution that would facilitate information sharing and analytics from around the world to identify and prevent fraudulent traffic by focusing on network identification rather than numbers. The first phase of the Fraud Deterrent Proof of Concept (PoC)<sup>8</sup> has been completed with some of the largest GSMA mobile operator members internationally. The GSMA would welcome an opportunity to brief the FCC on these efforts and next steps.

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<sup>7</sup> News Release, *ACTING CHAIRWOMAN ROSENWORCEL SIGNS MOU WITH AUSTRALIAN COUNTERPART TO WORK TOGETHER IN FIGHTING ILLEGAL ROBOCALLS AND SPOOFING*, Jun 3, 2021, available at <https://www.fcc.gov/document/fcc-signs-robocall-enforcement-mou-australian-partners>.

<sup>8</sup> GSMA Fraud and Security Services