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The Honorable Jessica Rosenworcel
Commissioner
Federal Communications Commission
Washington, D.C. 20554

Dear Commissioner Rosenworcel:

Thank you for your recent letter to Verizon CEO Hans Vestberg about the importance of free tools consumers can use to insulate themselves from the incessant flow of unwanted and illegal robocalls. We know our customers hate these calls and we are taking aggressive steps on multiple fronts, summarized below, to address this growing problem.

While ultimately the robocall problem needs to be addressed by stopping illegal robocalls at the source and by implementing technology to prevent bad actors from disguising their identities, Verizon agrees that customers also deserve ways to protect themselves from robocalls. To that end, we provide tools that wireless and wireline customers can use to help insulate themselves from unwanted and illegal robocalls, and we empower our customers to use options available from third parties.

Verizon's Robocall Detection and Blocking Toolsets

More than a year ago, Verizon added robocall protection features for no additional charge to wireless customers subscribing to our Call Filter service (\$2.99/month).¹ For all incoming calls, the service provides caller ID information and an innovative risk meter that explains the level of risk associated with the call. If a call meets Verizon's spam criteria, the incoming call screen will display a spam label. Customers also have the option to send directly to voicemail any spam calls falling into the risk category they choose to block and can look up identified spam numbers in our database. As we enhance our robocall protection features, we are also evolving our pricing for the features that are most important to our customers – spam detection and blocking. We currently offer free alerts about potential spam calls to customers with certain Android phones, and we will begin rolling out free spam alerting and blocking to all of our customers whose smartphones support those features starting in March.

¹ See <https://www.verizonwireless.com/support/call-filter-faqs/>. The service was previously called Caller Name ID.

On the wireline side, all Verizon customers with Caller ID service, whether they are served over fiber or copper facilities, receive Verizon’s Spam Alerts service for free.² The caller ID displays show “SPAM?” before a caller’s name if the calling number matches Verizon’s spam criteria. Since its launch last year, this feature has alerted Verizon customers about nearly a billion malicious robocalls. Verizon also makes sure its Fios Digital Voice customers are aware of the free blocking service offered by Nomorobo, which relies on the simultaneous ring feature that we provide for free to those customers. We have worked with Nomorobo to implement a “one click” feature to enable our customers to efficiently sign up with its service if they choose to do so.

Stopping Robocalls at the Source and Restoring Trust in Caller ID

Verizon is an industry leader on multiple initiatives to address the spoofing problem and to root out illegal robocallers at the source. Blocking solutions cannot fully resolve the robocall problem because it is easy for spammers to use computers to call large numbers of consumers while disguising their identities by changing the “calling party number” of their calls to make it seem like they are coming from a different number. That practice is called “spoofing.” In most cases, Verizon cannot identify the illegal robocaller because the spoofed robocalls typically start with Internet-based providers (often internationally), and then pass through several other companies’ networks before reaching Verizon. So Verizon usually has no way to tell who made the calls unless each of those “upstream” carriers agrees to provide information about where the calls are coming from – and unfortunately our attempts to trace back suspicious traffic often dead-end when one of those upstream companies in the call path refuses to cooperate. Verizon’s work addressing these challenges includes:

- Verizon has implemented programs to prevent our services from being used by illegal robocallers. We are encouraging other voice service providers to implement similar “know your customer” programs and have encouraged the Commission to take action against providers that do not implement appropriate practices both to trace back illegal traffic and to avoid originating it in the first place.
- Verizon is committed to deploying the new “STIR/SHAKEN” call authentication technology to protect consumers from spoofed calls. This technology will help service providers evaluate whether a call is spoofed. We have invested substantial amounts of time and resources upgrading our networks with the STIR/SHAKEN technology.
- Verizon is a founding member of the USTelecom Industry Traceback Group, an industry-led organization that traces back suspicious robocall traffic and stops many illegal robocalls. Since we and two other service providers founded the group two years ago, over twenty more have joined us. While these activities obviously have not solved the problem, the flood of illegal robocalls would be even greater without them.³

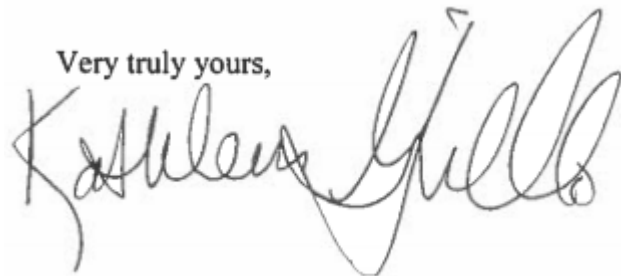
² See <http://www.verizon.com/about/news/block-spam-robocalls-with-verizon-new-tool>.

³ See Letter from Rosemary C. Harold, FCC, to Jonathan Spalter, USTelecom (Nov. 6, 2018), (available at <https://docs.fcc.gov/public/attachments/DOC-354942A2.pdf>).

- We support stronger federal laws to outlaw improper spoofing. Few robocallers get charged with illegal spoofing because under the Truth in Caller ID Act, the government currently must prove that the caller intended to defraud, cause harm, or illegally obtain something of value. Verizon supports a simple rule that would make it illegal for any caller to use any phone number that it is not authorized to use. Verizon also supports legislation requiring service providers to deploy the STIR/SHAKEN call authentication technology.

Thank you again for your strong commitment to addressing this important issue. Please know that Verizon fully appreciates the harm caused by robocalls and we are committed to working on multiple fronts to better protect our customers.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kathleen Grillo". The signature is fluid and cursive, with a large, sweeping flourish at the end.