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Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Re: *Call Authentication Trust Anchor*, WC Docket 17-97
Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket 17-59

Dear Commissioner Rosenworcel:

In response to your letter to Pat Esser, president of Cox Communications, Inc., dated December 12, 2018, Cox is pleased to provide the following information.

Cox agrees that fraudulent and unwanted robocalls are a growing nuisance for consumers, businesses and service providers. Cox is committed to a comprehensive long-term industry solution and is making free tools available to its customers as it rolls out its next generation network to address the problem in the short-term.

Cox has been working with others in the industry and the FCC to develop a long-term solution that can adapt to the changing tactics deployed by bad actors. Cox detailed its participation and implementation plan for the SHAKEN/STIR framework in its response, dated November 19, 2018, to FCC Chairman Ajit Pai's letter from November 5, 2018.¹

Cox is committed to implementing a robust call authentication framework in 2019. Cox has been actively involved for several years in the efforts to develop the SHAKEN/STIR framework in various industry standards fora. This includes participation on The Alliance for Telecommunications Industry Solutions (ATIS)/SIP-Forum IP-NNI Task Force and the Robocall Strike Force. Cox was also a participant in the Call Authentication Trust Anchor (CATA) working

¹ Letter from Jennifer Hightower, Cox Communications, to Chairman Ajit Pai, FCC, WC Docket 17-97 (filed November 19, 2018).

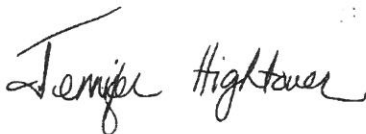
group of the North American Numbering Council (NANC). And today, Cox is engaged in the ATIS activities involving the establishment of the SHAKEN/STIR governance authority.

In the meantime, as industry continues its work on and deployment of SHAKEN/STIR and as Cox continues its current transition of its residential customer base to a new IP Multimedia Subsystem (IMS) platform, Cox is rolling out free access to Nomorobo. This third-party cloud-based service, which was featured at the FCC's expo on robocall mitigation techniques in April 2018, automatically intercepts and hangs up on robocallers and telemarketers. The Nomorobo service should be available to the vast majority of Cox's residential customers on the new voice services platform throughout 2019.

In addition, on behalf of its customers, Cox currently participates in two programs that were developed as part of the FCC's Robocall Strike Force effort. The first is the "Do Not Originate" activity that blocks calls where the originating telephone number is explicitly prohibited from originating calls, such as calls spoofing the IRS's customer care telephone numbers. The second is the "Traceback" activity that allows a customer to file a complaint with their service provider about a call they have received; their service provider can contact the originating carrier (if known) and have the originating carrier investigate and potentially shutdown the bad actors.

Cox is supportive of the Commission's efforts to stop unwanted robocalls and will do its part to ensure the success of those efforts.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Hightower". The signature is written in a cursive, flowing style.

Jennifer Hightower
Senior Vice President and General Counsel
Cox Communications