



Thomas J. Navin
202.719.7487
tnavin@wileyrein.com

VIA ELECTRONIC FILING

October 12, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

On October 10, 2018, Kevin Hughes, General Counsel, Rich Fruchterman, Associate General Counsel, Bob McKay, General Manager – Risk Solutions, with Neustar, Inc. (“Neustar”), and Bennett Ross of Wiley Rein LLP met separately with: (1) Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Ajit Pai; (2) Arielle Roth, Wireline Legal Advisor to Commissioner Michael O’Rielly, and Kagen Despain, Legal Intern; and (3) Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Jessica Rosenworcel. On October 11, 2018, Messrs. Hughes, Fruchterman, and McKay and the undersigned with Wiley Rein LLP met with: (1) Daniel Margolis, Acting Legal Advisor; (2) Karen Schroeder, Attorney Advisor; (3) Jerusha Burnett, Attorney Advisor; (4) Josh Zelais, Attorney Advisor; (5) John B. Adams, Deputy Chief; (6) Kurt Schroeder, Chief; (7) Mark Stone, Deputy Bureau Chief; and (8) Eric Burger, Chief Technology Officer. The purpose of these meetings was to discuss Neustar’s comments in the above-referenced proceeding.

During these meetings, Neustar discussed its Information Analytics solutions and its commitment to combatting illegal robocalling and protecting consumers from illegal calls. Neustar explained that its engineers helped create the STIR/SHAKEN protocols for IP call authentication and that Neustar is hosting the ATIS STIR/SHAKEN testbed. Neustar also outlined the robust set of tools the company offers to help customers avoid calling consumers with reassigned telephone numbers and to protect consumers from such calls.

Neustar discussed its view that that the Commission should rely upon – and establish a safe harbor for customers that use – existing commercial solutions rather than establishing a government database for disconnected or reassigned numbers. As Neustar explained, this approach would promote usage of Telephone Consumer Protection Act (TCPA) compliance services generally, which would protect consumers and drive competition among existing providers, which will lead to greater innovation and lower prices. In Neustar’s view, leveraging existing commercial solutions could be implemented much more cheaply and quickly than creating a new government database and would avoid having the government compete against private enterprise. Finally, Neustar outlined the mechanics of a TCPA safe harbor based on use

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of a commercial solution that allows customers to avoid calling consumers with reassigned telephone numbers.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'T. Navin', is positioned above the printed name.

Thomas J. Navin
Counsel to Neustar, Inc.

cc: Zenji Nakazawa
Arielle Roth
Travis Litman
Daniel Margolis
Karen Schroeder
Jerusha Burnet
Josh Zelais
John B. Adams
Kurt Schroeder
Mark Stone
Eric Burger