



January 23, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Ex Parte Presentation, Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket 17-59, Call Authentication Trust Anchor, WC Docket No. 17-97.

Dear Ms. Dortch:

On January 22 and 23, 2018, representatives from CTIA along with our members met separately with representatives from the Office of Chairman Ajit Pai; and the Offices of Commissioners Michael O’Rielly, Brendan Carr, Mignon Clyburn, and Jessica Rosenworcel to discuss the above-captioned proceedings. A full list of meeting attendees is attached to this filing.

CTIA provided attendees with the attached Power Point presentation, which summarizes the items discussed. We discussed the wireless industry’s innovations to help stop robocalls. In addition, we explained our support for a voluntary call-blocking framework with safe harbor protections and continued innovation to stop robocalls. Furthermore, we discussed our support for call authentication to combat illegal robocalls and asked the FCC to support industry work and encourage widespread adoption of call authentication protocols at home and abroad. Finally, we explained that a new reassigned number database would be complex and of limited utility.

Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being electronically filed with your office. If you have any questions regarding this submission, please contact the undersigned.



Sincerely,

/s/ Krista L. Witanowski

Assistant Vice President, Regulatory Affairs

cc: Amy Bender
Nicholas Degani
David Grossman
Umair Javed
Travis Litman
Zenji Nakazawi
Nirali Patel
Jamie Susskind



ATTACHMENT

January 22, 2018 Meeting Participants:

Meeting with Office of Chairman Pai

Chairman's Office

Nicolas Degani
Zenji Nakazawa
Nirali Patel

Industry Representatives

Harold Salters (Consultant for CTIA)
Melanie Tiano, CTIA
Krista Witanowski, CTIA
Linda Vandeloop, AT&T
Keith Buell, Sprint
Indra Chalk, T-Mobile
Chris Oatway, Verizon

Meeting with Office of Commissioner O'Rielly

Commissioner's Office

Amy Bender

Industry Representatives

Harold Salters (Consultant for CTIA)
Melanie Tiano, CTIA
Krista Witanowski, CTIA
Linda Vandeloop, AT&T
Keith Buell, Sprint
Indra Chalk, T-Mobile
Chris Oatway, Verizon

Meeting with Office of Commissioner Rosenworcel

Commissioner's Office

Umair Javed
Travis Litman



Industry Representatives

Harold Salters (Consultant for CTIA)
Melanie Tiano, CTIA
Krista Witanowski, CTIA
Linda Vandeloop, AT&T
Keith Buell, Sprint
Indra Chalk, T-Mobile
Chris Oatway, Verizon

Meeting with Office of Commissioner Carr

Commissioner's Office

Jamie Susskind

Industry Representatives

Harold Salters (Consultant for CTIA)
Melanie Tiano, CTIA
Krista Witanowski, CTIA
Linda Vandeloop, AT&T
Keith Buell, Sprint
Indra Chalk, T-Mobile
Chris Oatway, Verizon

January 23, 2018 Meeting Participants

Meeting with Office of Commissioner Clyburn

Commissioner's Office

David Grossman

Industry Representatives

Harold Salters (Consultant for CTIA)
Krista Witanowski, CTIA
Linda Vandeloop, AT&T
Keith Buell, Sprint
Chris Oatway, Verizo



The Wireless Industry is Committed to Working with the FCC to Stop Robocalls

January 23, 2018

Wireless Industry's Multifaceted Approach to Robocalls

1. The Wireless Industry is Innovating to Help Stop Robocalls
2. CTIA Supports a Voluntary Call-Blocking Framework With Safe Harbor Protections, and Continued Innovation to Stop Robocalls
3. CTIA Supports Call Authentication to Combat Illegal Robocalls and Encourages the FCC to Support Industry Work and Encourage Widespread Adoption of Call Authentication Protocols at Home and Abroad
4. A New Reassigned Number Database Would be Complex and of Limited Utility

01

The Wireless Industry is Innovating to
Help Stop Robocalls

The Wireless Industry Is Focused on Preventing Robocalls

- The wireless industry, government, and consumers are all working to stop robocalls
- The wireless industry collectively blocks millions of robocalls per day and is continuing to innovate on new solutions to stop robocalls
- Spoofers, scammers, and other bad actors are the root cause of the robocalling problem. Industry and FCC must collaborate to help prevent robocalls from these bad actors to consumers

The Wireless Industry Has Worked with Government to Stop Robocalls

To prevent robocalls, the wireless industry has:

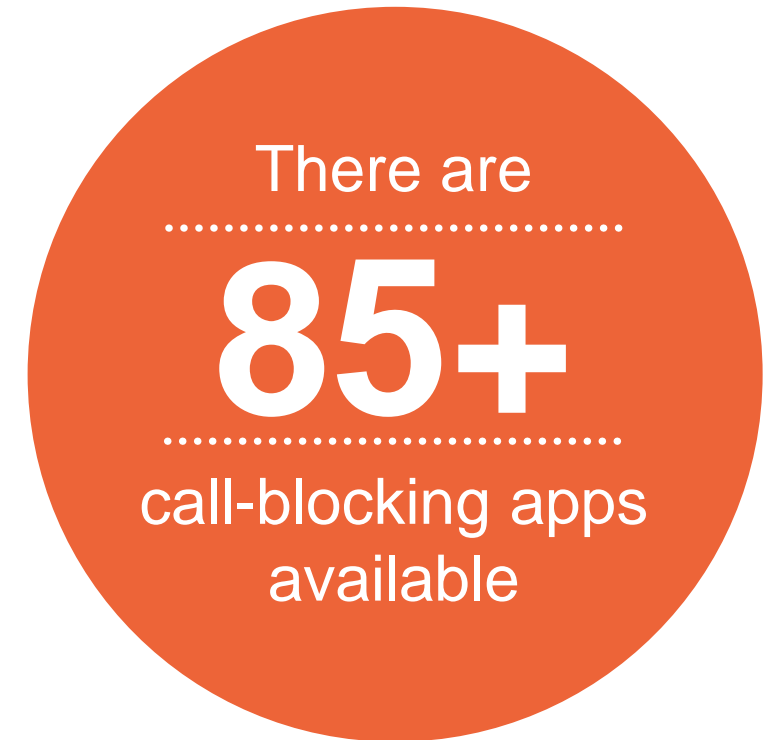
- Developed solutions with FCC and members of Industry Robocall Strike Force
 - Carriers and trade associations led this effort
 - Industry implemented recommendations from Oct. 2016 Strike Force Report, often on accelerated schedule
- Assisted the FCC and FTC with law enforcement investigations against robocallers
- Maintained relationships with call fraud bureaus that may initiate investigations after a suspected mass calling event



The Wireless Industry Has Innovated to Help Stop Robocalls

To prevent robocalls, the wireless industry has:

- Adopted new tools for customer use
 - Call blocking
 - Spam call predictions
- Leveraged the capabilities of the app ecosystem — there are over 85 call-blocking apps across all platforms available to help consumers block robocalls, including several offered to carrier customers at no charge



The Wireless Industry Has Innovated to Help Stop Robocalls



Source: <https://www.ctia.org/consumer-tips/robocalls>

To prevent robocalls, the wireless industry has:

- Launched a CTIA webpage devoted to providing consumers instructions on how to stop robocalls
- Shared best practices in CTIA's Robocall Working Group and other associations
- Partnered with standards bodies like the ATIS and SIP Forum on the SHAKEN/STIR framework to authenticate phone calls
- CTIA Cyber Threat Information Sharing Pilot: New Automated Traceback Approach to Robocall Threat Information Sharing

02

CTIA Supports a Voluntary Call-Blocking Framework With Safe Harbor Protections and Continued Innovation to Stop Robocalls

Safe Harbors and Continued Collaboration Are Necessary to Combat Unlawful and Unwanted Robocalls

Consistent with the goal of helping customers control the types of calls they receive, the FCC should:

- Enact a safe harbor that protects carriers who block calls
- Continue work with industry on new robocall solutions

Burdensome New Processes or Complex New Infrastructure Won't Help Combat Unlawful and Unwanted Robocalls

The FCC should reject calls to mandate burdensome new processes or create complex new infrastructure:

- White lists create logistical and security challenges
- A centralized database or administrator would create complexity and expense without attendant benefit



A mandate to use particular approaches will stymie creativity by creating “Static measures...will likely be outpaced by the ingenuity of fraudsters and criminals.”

- First Orion Comments, at 3

FCC Call Blocking FNPRM

- Preventing False Positives
 - Industry efforts are already underway to improve scoring/validation of robocalls
 - US Telecom hosted a workshop on November 3rd to begin the discussion on developing best practices for scoring and validating call originations and protecting legitimate calls
 - Care needs to be taken not to disincent carriers from ongoing call-blocking activities
 - Goal should be enhancing consumer choice in managing the calls they receive
- Measuring Effectiveness
 - Industry-wide data sources may provide a better means for developing effectiveness measures than voice service provider reporting
 - Measuring “illegal” robocall blocking requires content examination and may not be feasible



03

CTIA Supports Call Authentication to Combat Illegal Robocalls and Encourages the FCC to Support Industry Work and Encourage Widespread Adoption of Call Authentication Protocols at Home and Abroad

The Wireless Industry Supports Call Authentication, Including Implementation of a Trust Anchor, To Combat Illegal Robocalls

U.S carriers need confidence in the digital certificates underlying call authentication and verification



The Commission should move quickly “to designate a governance authority and administrator so that the certification process envisioned by SHAKEN/STIR framework can get underway.”

- FCC Charman Ajit Pai

Steps to Promote Effective Call Authentication

The FCC should:

- Support industry leadership in promoting authentication including solving implementation issues via standards bodies
- Support voluntary implementation of authentication solutions
- Recognize that call authentication is a global problem and assert leadership to promote SHAKEN/STIR and encourage other nations to participate in call authentication efforts

CTIA Recommends A “Hybrid” Trust-Anchor Governance Structure, Informed by Industry Consensus

- In a hybrid governance model, industry defines and operates the structure with regulatory endorsement from the FCC
- CTIA looks forward to participating on the NANC’s Call Authentication Working Group to explore Governance Authority (“GA”) structure
- The FCC/FCC-delegated GA should designate Policy Administrator responsibility to an industry-supported entity
 - Standards bodies can determine what entities have right structure/experience to oversee call authentication
- CTIA supports ATIS’ recommendations with respect to certification authorities and service provider requirements

Possible Approaches: Role of Industry and FCC

Regulatory Mandate

FCC Directed: Rules established and used by STI-GA (Secure Telephone Identify Governance Authority); Changes to governance rules require formal regulatory process

Example: NPAC

Hybrid (recommended)

Industry defined and operated, with regulatory endorsement. Retains flexibility to respond to evolving robocalling “threat”.

Example: Administrative Council for Terminal Attachments (Part 68 reg)

Industry Committee

Industry Directed: Industry creates and manages structure autonomously

Example: ATIS IMSI Oversight Council

All other Operational and Policy Questions Should Be Addressed in an Industry Consensus Process

- The Joint ATIS and SIP Forum, via IP-NNI Taskforce, are working on implementation issues like enrollment and communication protocols
- Call authentication for modern networks should not be impeded by legacy system challenges

04

A New Reassigned Number Database Would
be Complex and of Limited Utility



Wireless Industry Efforts to Combat Unwanted and Illegal Robocalls

The wireless industry is making strides in attacking unwanted robocalls from bad actors

- Many of CTIA's members maintain call fraud bureaus that may initiate investigations after a suspected mass calling event
- Many CTIA members allow customer access to a variety of consumer-facing tools to mitigate illegal robocalls, such as network and cloud-based robocall blocking and scam detection software

Wireless Industry Efforts to Combat Unwanted and Illegal Robocalls



Many carriers already work with third-party vendors that provide solutions to help businesses avoid calls to reassigned numbers

Marketplace Solutions for Reassigned Numbers

Common attributes of TCPA compliance solutions available from Neustar, Danal, Payfone, Syniverse and others:

- Covers more than 90% of wireless subscribers
- Yields a positive, negative, or likelihood finding of consumer consent to receive robocalls
- Utilizes mobile carrier data
- Data is relevant and timely

Marketplace Solutions for Reassigned Numbers

Establishing safe harbors around existing solutions can:

- Increase competition among solutions
- Enhance coverage, accuracy and timeliness of data
- Encourage adoption
- Mitigate TCPA risks for good faith callers

A New Reassigned Number Database Would Introduce Unique Operational, Technical, and Financial Challenges

- Standing up a new database of reassigned numbers raises complex issues that will take significant time to resolve:
 - **Operational:** A continuously updated database requires carriers to establish new IT infrastructure and data feeds
 - Neither the FCC's Numbering systems (NRUF – Active/Assigned/Aging, but not “Reassigned”) nor Carriers' possess the disconnected/reassigned numbers being sought
 - **Technical:** Creating interoperable solutions with strong privacy and security protections requires new resources
 - **Financial:** Any new database will impose significant monetary burdens on carriers and callers
- **Important:** A centralized database will not eliminate unwanted calls to reassigned numbers from bad actors

CTIA Suggestions for Policymakers

- Maintain focus on combatting unwanted or illegal robocallers from bad actors through call authentication and blocking
- Revisit 2015 TCPA Declaratory Ruling and/or establish one or more safe harbors for good-faith callers using commercial TCPA solutions
- If FCC is determined to proceed with a new database, the FCC should consult the NANC on what is feasible, as the Commission's expert on numbering



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Learn more at ctia.org