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VIA ELECTRONIC FILING

October 29, 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 25, 2018, Rich Fruchterman, Associate General Counsel, and Bob McKay, General Manager – Risk Solutions, with Neustar, Inc. (“Neustar”), as well as the undersigned with Wiley Rein LLP met with Jamie Susskind, Chief of Staff to Commissioner Brendan Carr. The purpose of the meeting was to discuss Neustar’s comments in the above-referenced proceeding.

During the meeting, Neustar discussed its Communications Solutions products that are used in 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 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.

However, if the Commission nonetheless decides to establish a government disconnected numbers database, it should ensure that commercial solution providers have access to that database and grant a safe harbor to callers that utilize the database directly or indirectly.¹ As Neustar explained during the meeting, this approach would facilitate TCPA compliance. It also

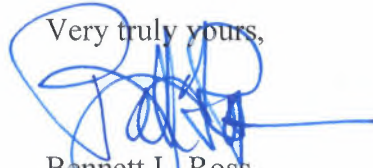
¹ See *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Second Further Notice of Proposed Rulemaking, FCC 18-31, CG Docket No. 17-59, ¶ 25 (rel. March 23, 2018) (noting that callers “may use the database directly or may wish to have entities that are not callers (such as data aggregators or entities that manage callers’ call lists) use the database”).

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would avoid requiring that callers migrate from use of a commercial solution to the government database in order to benefit from the safe harbor – a migration that could involve significant switching costs.

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

Very truly yours,



Bennett L. Ross
Counsel to Neustar, Inc.

cc: Jamie Susskind