



February 28, 2018

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation, CG Docket No. 17-59 and WC Docket No. 17-97

Dear Ms. Dortch:

On February 26, 2018, Margot Saunders from the National Consumer Law Center and Maureen Mahoney (via phone) of Consumers Union met with Mark Stone, Kurt Schroeder, and Jerusha Burnett of the Federal Communications Commission (FCC).

We discussed the Further Notice of Proposed Rulemaking on Advanced Methods to Target and Eliminate Unlawful Robocalls.<sup>1</sup> The points we addressed are included in the reply comments filed by the consumer groups on February 22, 2018.<sup>2</sup>

In addition, we clarified a point in reference to our proposed centralized system for evaluating call unblocking requests, which we note should be guided by a set of consumer-friendly criteria. In our comments, we pointed out that the party submitting an unblocking request should be required to verify that their caller ID information is accurate, to ensure that callers are not engaging in caller ID spoofing to evade blocks.<sup>3</sup> At the meeting, we noted that if an unblocking system is established before caller ID authentication technology has been fully implemented, that an alternative means to confirm the accuracy of the caller ID information may be used.

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<sup>1</sup> In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, Report and Order and Further Notice of Proposed Rulemaking, CG Docket No. 17-59 (Rel. Nov. 17, 2017), *available at* [https://ecfsapi.fcc.gov/file/111717758568/FCC-17-151A1\\_Rcd.pdf](https://ecfsapi.fcc.gov/file/111717758568/FCC-17-151A1_Rcd.pdf).

<sup>2</sup> See, Reply Comments of Consumers Union, National Consumer Law Center, et al., CG Docket No. 17-59 (Feb. 22, 2018), <https://ecfsapi.fcc.gov/file/102230569505816/Consumer%20group%20reply%20comments%20FNPRM%2002.22.18.pdf>.

<sup>3</sup> *Id.* at 5.

We also correct one point made in the comments. We stated that the FCC's new call-blocking rules, which allow voice service providers to block four categories of illegally spoofed calls—at the request of the subscriber of the spoofed number, and calls spoofed with unassigned, unallocated, or invalid numbers—have not yet taken effect.<sup>4</sup> In fact, these rules went into effect on February 12, 2018.<sup>5</sup>

Please contact Margot Saunders at the National Consumer Law Center (NCLC), [msaunders@nclc.org](mailto:msaunders@nclc.org) (202-452-6252, extension 104) or Maureen Mahoney at Consumers Union, [mmahoney@consumer.org](mailto:mmahoney@consumer.org) (415-431-6747), with any questions.

This disclosure is made pursuant to 47 C.F.R. §1.1206.

Sincerely,

Margot Saunders  
Maureen Mahoney

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<sup>4</sup> *Id.* at 3.

<sup>5</sup> Advanced Methods to Target and Eliminate Unlawful Robocalls, 83 Fed. Reg. 1566 (Jan. 12, 2018), <https://www.gpo.gov/fdsys/pkg/FR-2018-01-12/pdf/2018-00457.pdf>.