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March 6, 2018

Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Ex Parte Submission

RE: In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls CG Docket No. 17-59

Dear Ms. Dortch:

On March 1, 2018, Steve Klimacek, Vonda Long-Dillard, Adam Panagia, Amanda Potter and the undersigned met with John Adams (telephone), Jerusha Burnett, Karen Schroeder (telephone), Kurt Schroeder, and Mark Stone to encourage the Commission to issue an FNPRM to expand the types of numbers that can be blocked if illegal robocall activity is detected and to propose a safe harbor if a legitimate call is inadvertently blocked.

AT&T discussed the steps it takes before blocking any call. AT&T's process is summarized in the attached presentation.

The industry is still limited in the types of calls it can block and expanded blocking would benefit consumers. AT&T understands that every effort must be made to avoid blocking a legitimate call but occasionally that may happen. AT&T proposed a safe harbor in the event a service provider inadvertently blocks a legitimate call:

> A carrier that has inadvertently blocked legitimate voice calls shall not be deemed to have violated the Communications Act of 1934, as amended, or the Commission's rules if, at the time the call(s) were blocked, the carrier:
>
> a) Performed network blocking of calls in connection with an event that the carrier had good faith reason to believe was an illegal robocalling event;
> b) Had procedures in place for network blocking that were reasonably likely to confirm that calls being blocked are illegal robocalls;
> c) Followed those procedures; and
> d) Had a process for unblocking legitimate voice calls.

AT&T

While AT&T has blocked 3.3 billion robocalls through February 21, 2018, call blocking is only one of many tools to combat the scourge of illegal robocalls and, by itself, cannot solve the problem. It is important that there be a robust trace-back process with vigorous and consistent enforcement action.

In accordance with section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please feel free to contact me if you have any questions.
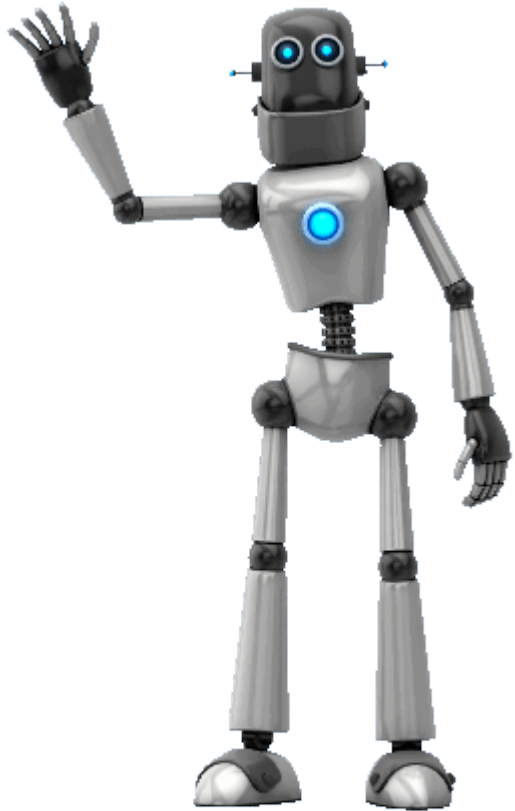
Sincerely,

cc: John Adams
        Jerusha Burnett
        Karen Schroeder
        Kurt Schroeder
        Mark Stone

AT&T

Detection, Assessment & Treatment of Robocalls

Presented by:

Adam Panagia
Director AT&T
Global Fraud Management Organization

FCC/FTC In-Person Meetings
March 1, 2018
Washington, DC

Detection

Multiple conditions on our network may trigger a number for investigation such as;

- **Low Average Call Duration**

- **Call Completion Ratios**

- **Invalid numbers placing large volumes of calls (NPA-555-1212)**

- **Common CNAM values across service providers (SURVEY, CUST SERV, VOIP CALLER etc.)**

- **Large burst of calls in a small time window**

- **Large volume of complaints related to suspect robocaller line**

- **Sequential dialing patterns**

- **Neighbor Spoofing patterns**

- **Patterns that indicate TCPA and other contract violations**

- **Correlation of AT&T network data with complaint data from regulators, customers and other carriers.**

- **Compare numbers dialed with lines on the FTC Do Not Call list**

Robocall Detection Report Format

Suspect Robo Caller	CNAM Value	LNP Lookup	# of Calls	Answered	Unanswered	% Unanswered
719-29X-XXXX	CLAIMS ASST	CLEC A	100,000	50,000	50,000	50%

# of Minutes	ALOC	# of Unique Term Numbers	# of Calls to Wireless	FTC Complaints	FCC Complaints	AT&T Fraud Complaints	DNC Listed
8,333	5 sec	90,000	80,000	5,500	4,500	700	47,000

Investigation

- **Robocall report is distributed to investigators in specific intervals with judicious review of system fields for suspect robocaller identification**

- **Additional call detail or summary queries are performed to further investigate calling patterns**

- **Each telephone number is researched online for consumer reports regarding the nature of the call (Cardholder services, vacation/resort offers, political calls, survey, collections, etc.)**

- **Each telephone number is dialed to obtain additional information on the entity placing the robocalls.**

- **AT&T reaches out to service providers of suspected robocaller traffic to authenticate information**

- **Process in place to suppress alerting on legitimate numbers and traffic aggregation lines that behave like robocallers**

- **Cold line process in place to ensure stale blocks are removed from the network and will not adversely impact customers (line reassignments)**

Result

- **3.3 Billion robocalls prevented through 2/21/18. Very few complaints received related to this blocking process.**

- **Complaints received are immediately investigated and block is removed until investigation is completed**

- **Investigations underway with appropriate agencies to perform root cause removal at the source of these organized robocalling campaigns**

- **Blocking is one of many tools to suppress robocalling and must coincide with Trace-back and consistent enforcement on bad actors**

GFMO Robo Call Blocking Process