



State of Wisconsin  
Governor Tony Evers

**Department of Agriculture, Trade and Consumer Protection**  
Bradley M. Pfaff, Secretary

April 3, 2019

Ajit Pai, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Mr. Pai,

I write today regarding the Federal Communications Commission's (FCC) recent *Federal Register* notice on implementation of the Truth in Caller ID rules related to the recently adopted amendments regarding misleading and inaccurate caller ID information. I sincerely appreciate the opportunity to provide comment on this important growing problem. Telemarketing is the number one consumer complaint to Wisconsin's Bureau of Consumer Protection. As with other states, the vast majority of these complaints are not regarding legitimate telemarketers but instead callers hiding behind spoofed and blocked numbers to steal money and consumer information. In a recent *Washington Post* article, First Orion, a company that provides blocking technology, estimates half of all cell phone calls this year will be from scammers.

To protect our citizens, we encourage the broadest scope of regulation that is permissible with the clearest of intent and understanding of the regulation. As you develop rules and processes, I urge you to consider the following key themes.

*Emerging technology*

The State of Wisconsin urges the FCC to define terms and services broadly. The notice provides many technical elements and technical terms. We applaud all efforts to regulate current and emerging technology to communicate through voice and text technology. We hope that definitions will be adopted broad enough so as to anticipate future technology and methodology and to prevent loopholes occurring through advancements.

*Leadership on communications originating from outside the United States*

The *Federal Register* notice mentions this as a high priority, and we concur with this. As the notice points out, "... caller ID spoofing directed by people and entities outside the United States can cause great harm." Since the Federal government is in the best position to identify, investigate, and penalize these entities, we ask the FCC to devote resources.

*Many of these communications involve scams rather than solicitations to purchase goods or services.*

Wisconsin has its share of scams where callers pretend to be government or other regulatory entities. Recently, the Milwaukee County Sheriff's Office issued a press release that reported a spoofing effort where scammers used telephone numbers that mimicked the Sheriff's Office to threaten citizens with claims that felony charges have been drafted against them. Given that these calls are not solicitations, but calls to prey on individuals for money and personal information, the best way to combat them is to eliminate their ability to mislabel the caller ID to trick consumers and their use of the telephone by preventing the connection of the call to the consumer. Wisconsin supports any efforts aimed at eliminating the use of technology to convey scare tactics designed to scam consumers through deceptive practices.

I commend the efforts of the Commission to solicit additional information on this important topic and in its enforcement. I look forward to working with you and for continued opportunities to protect consumers in our great state of Wisconsin.

Sincerely,

Lara Sutherlin, Administrator  
Division of Trade and Consumer Protection

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