



April 12, 2021

**Via ELECTRONIC FILING**

Marlene H. Dortch Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: *Ex Parte* Letter, Call Authentication Trust Anchor, WC Docket No. 17-97**

Dear Ms. Dortch:

On April 8, 2021, representatives of CTIA and AT&T, T-Mobile, UScellular, and Verizon (collectively, “CTIA”) met via teleconference with David Strickland, Acting Legal Advisor from Acting Chairwoman Jessica Rosenworcel’s Office, to encourage the Commission to grant CTIA’s Petition for Partial Reconsideration (“Petition”)<sup>1</sup> of the Foreign Provider Prohibition, which requires non-U.S. voice service providers to certify to having robocall mitigation solutions in place no earlier than June 30, 2021 and compels U.S. voice service providers to begin blocking voice traffic from non-U.S. voice service providers that do not comply 90 days after the certification deadline.<sup>2</sup> A full list of teleconference participants is provided in the Appendix to this letter.

During the meeting, CTIA expressed its support of the Acting Chairwoman’s anti-robocall agenda<sup>3</sup> and the Commission’s efforts to strike a careful balance between protecting legitimate calls and protecting consumers from illegal and unwanted robocalls, including calls from outside the U.S. CTIA explained that the Foreign Provider Prohibition may risk upsetting this balance by compelling U.S. voice service providers to block legitimate traffic, especially from Americans travelling or working abroad that rely upon mobile wireless roaming services.

CTIA explained that successful implementation of the Prohibition is dependent on the actions of potentially hundreds of international voice service operators and interconnection partners around

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<sup>1</sup> Petition for Partial Reconsideration of CTIA, WC Docket No. 17-97, (filed Dec. 17, 2020) (“Petition”). As CTIA has highlighted, there is overwhelming record support for the Petition. Eight parties support the Petition, and Voice on the Net Coalition filed a similar petition. See WC Docket No. 17-97, *Call Authentication Trust Anchor* (reflecting support from AT&T Services, Inc., BT Americas Inc., GSMA, IDT Telecom, Inc., INCOMPAS and Cloud Communications Alliance, T-Mobile USA, Inc., and USTelecom – The Broadband Association). Only a single party—ZipDX LLC—opposes it.

<sup>2</sup> See *Call Authentication Trust Anchor*, Second Report and Order, WC Docket No. 17-97, ¶¶ 82-94 (rel. Oct. 1, 2020).

<sup>3</sup> See, e.g., News Release, *Acting Chairwoman Rosenworcel Kicks Off Anti-Robocall Agenda*, (Mar. 17, 2021), <https://docs.fcc.gov/public/attachments/DOC-370865A1.pdf>; John C. Spiller, et al. *Forfeiture Order*, FCC 21-35, Statement of Acting Chairwoman Jessica Rosenworcel (Mar. 18, 2021) (urging the Commission to “redouble [its] efforts to issue Cease and Desist letters”).



the globe, and CTIA noted a lack of awareness of the Commission's impending Prohibition, as well as significant questions about how the new rule will be applied and how the Commission's new certification database will operate. While U.S.-based wireless service providers have been working to educate their foreign voice service partners, including working with CTIA to develop educational materials, CTIA encouraged the Commission to supplement those efforts by engaging other federal agencies and international regulatory counterparts to ensure non-U.S. voice service providers can meet the Commission's requirements and avoid unintended consequences.

For these reasons, CTIA encouraged the Commission to issue a further notice to address the issues raised by the Foreign Provider Prohibition, including clarifying the scope and implementation of the new rule to ensure the appropriate providers are taking steps to help mitigate robocalls. By doing so, the Commission can develop a solution that appropriately balances the need to maintain voice calling services for Americans travelling or working abroad, while protecting American consumers from illegal or unwanted robocalls that originate outside of the United States. CTIA explained that granting the Petition will not undermine the Commission's and industry's significant efforts to protect U.S. consumers from foreign-originated robocalls by blocking illegal or unwanted robocalls using reasonable analytics and partnering with government to identify bad actors.<sup>4</sup>

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott Bergmann

Scott K. Bergmann  
Senior Vice President,  
Regulatory Affairs, CTIA

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<sup>4</sup> See, e.g., *FCC Issues Robocall Cease-And-Desist Letters to Six Voice Providers* (rel. Mar. 18, 2021), available at <https://www.fcc.gov/document/fcc-issues-robocall-cess-and-desist-letters-six-voice-providers>.



## **Appendix**

### **April 8, 2021 Meeting Attendees**

#### **FCC Office of Acting Chairwoman Rosenworcel**

David Strickland

#### **AT&T**

Linda Vandeloop

#### **Verizon**

Christopher Oatway

#### **CTIA**

Scott Bergmann

Matt Gerst

Sarah Leggin

#### **US Cellular**

Bill Tortoriello

#### **T-Mobile**

Pierce Gorman