



Christopher D. Oatway  
Associate General Counsel  
Federal Regulatory and Legal Affairs

1300 I Street, NW, Suite 500 East  
Washington, DC 20005  
Phone 202.515.2470  
Fax 202.336.7922  
[christopher.d.oatway@verizon.com](mailto:christopher.d.oatway@verizon.com)

May 7, 2018

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls,*  
*CG Docket No. 17-59***

Dear Ms. Dortch:

On May 3, 2018, Lulia Barakat, Jeff Haltom (by telephone) and I met with Eric Burger of the Office of the Office of Strategic Planning and Policy Analysis; Zenji Nakazawa, advisor to Chairman Pai; and John B. Adams, Kurt Schroeder, Jerusha Burnett, Karen Schroeder, and Mark Stone of the Consumer and Governmental Affairs Bureau. We explained Verizon's commitment to addressing the robocall problem on multiple fronts, and updated the Commission on our most recent activities.

We described the tools Verizon has deployed to empower our customers to better control what calls do and do not ring on their devices. We discussed our Spam Alerts service, which helps customers protect themselves from potential malicious robocalls.<sup>1</sup> That service is available at no additional charge to all landline voice customers with Caller ID service, whether they are served over fiber or copper facilities. Customers' Caller ID displays show "SPAM?" before a caller's name if the calling number matches Verizon's spam criteria. We also described our Caller Name ID service for wireless customers, which includes a feature to help customers recognize potential robocalls, spam and fraudulent calls.<sup>2</sup> It includes a risk meter that explains the level of risk associated with each call. We also described Verizon's telephone number categorization feedback website, which invites consumers and calling parties to report any instances where either of those services might have incorrectly categorized a call.<sup>3</sup>

---

<sup>1</sup> See <http://www.verizon.com/about/news/block-spam-robocalls-with-verizon-new-tool>.

<sup>2</sup> See <https://www.verizonwireless.com/support/caller-name-id-faqs/>.

<sup>3</sup> See [www.spamalerts.verizon.com](http://www.spamalerts.verizon.com).

Ms. Marlene H. Dortch  
May 7, 2018  
Page 2

And to address the challenges presented by Caller ID spoofing, Verizon is committed to deploying the STIR/SHAKEN authentication standard in our networks. We described the investments Verizon is making and the work streams underway to update multiple network elements. We expect to achieve initial operational capability later this year, with the bulk of production anticipated for 2019. We also explained the importance of moving swiftly to have a certificate governance regime in place prior to widespread cross-carrier passing on call authentication tokens. Consistent with the recent NANC report,<sup>4</sup> Verizon supports a “hybrid” governance model for the deployment of STIR/SHAKEN where the Commission endorses a flexible, industry-administered framework.

Finally, we discussed the appropriate scope of call blocking by service providers on a non-opt-in basis. Verizon supports the Commission’s clarification that carriers are permitted to block calls that are from unassigned, unallocated, or invalid numbers, and where the subscriber assigned a number authorizes the blocking. Verizon also supports requests to provide service providers with additional blocking flexibility, provided the Commission’s policy takes into account the risks of unintended consumer harms potentially associated with widespread blocking.

Pursuant to Section 1.1206(b)(1) of the Commission’s rules, I am submitting this *ex parte* notice letter into the above-referenced docket over the Electronic Comment Filing System.

Sincerely,

/s

Christopher Oatway

---

<sup>4</sup> See “Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR,” NANC Call Authentication Trust Anchor Working Group, attached to May 3, 2018 letter from Travis Kavulla, Chairman, North American Numbering Council, to Kris Monteith, Chief, Wireline Bureau (rel. May 2, 2018), [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-350543A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-350543A1.pdf).