May 24, 2019

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington D.C., 20554

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

Dear Ms. Dortch:

On May 21, 2019, Rebekah Johnson, CEO of Numeracle, Inc., met with Mark Stone, Patrick Webre, Kurt Schroeder, Jerusha Burnett, Karen Schroeder, and Eduard Bartholme of the Consumer and Governmental Affairs Bureau; and Kristi Thornton from the Enforcement Bureau. On May 23, 2019, Rebekah Johnson also met with Jamie Susskind, Chief of Staff to Commissioner Carr, to discuss the Commission's efforts to combat illegal and unwanted robocalls and authentication caller ID technologies.

Numeracle is the pioneer of call blocking and labeling visibility and control in the new calling ecosystem, providing actionable strategies for businesses whose legal calls have been improperly blocked or labeled as illegal robocalls. By working with major carriers, analytics companies, app developers, device manufacturers, and industry leaders, Numeracle delivers a path to call labeling control for call originators across the healthcare, retail, safety, government, utility, broadcast, financial, and resort industries.

I raised concerns about the use of analytics by voice service providers to perform default blocking on an opt-out basis for consumers. In the attachment presented, evidence was provided around how calls that consumers want to receive are frequently erroneously labeled as "Scam" or "Spam." Allowing voice service providers to block communications by default on an opt-out basis based on the varied analytics would create inconsistencies as identical lawful calls from the same caller are rated inconsistently even by the same analytics entity. The attached presentation shows that calls from seven phone numbers from the same caller were rated anywhere from low to high risk. One analytics entity rated calls from the same calling campaign by one company all the way from low risk to high risk.

Additionally, carriers and their analytics partners do not inform legal callers of how their calls are labeled and/or blocked. Because of these errors and lack of feedback from carriers and their partners to lawful callers, the voice channel will continue to be rendered a less effective means of communication despite consumer preference to receive voice communications from companies they do business with.

The draft order plays fast and loose with the terms “illegal call” and “unwanted call.” The Commission has never fully defined these terms. The same sales call that is illegal if the customer has not consented to receive it is perfectly legal with customer consent. Every customer will have their own definition of “unwanted call.” Numeracle supports providing customers with accurate labeling information so they can make informed decisions about whether to answer a call or have certain categories blocked based on their individual preferences.

While Numeracle fully supports the deployment of STIR/SHAKEN by voice service providers, I noted this is not a solution to identify legal vs. illegal or wanted vs unwanted calls. STIR/SHAKEN was designed to provide consistent traceback to determine the originating carrier, but STIR/SHAKEN does not determine whether a call is legal or illegal, or wanted or unwanted. The need for analytics will remain, but an even more pressing need is the ability for legal callers to identify to carriers and their analytics partners that they are making legal calls from telephone numbers they are authorized to use.

Respectfully submitted,

Rebekah Johnson, CEO
Numeracle, Inc.
McLean, VA
rebekah@numeracle.com

Cc (via email)

Patrick Webre
Mark Stone
Kurt Schroeder
Jerusha Burnett
Karen Schroeder
Eduard Bartholme
Kristi Thornton
Jamie Susskind

Numeracle

On a mission to establish trust in customer communications.

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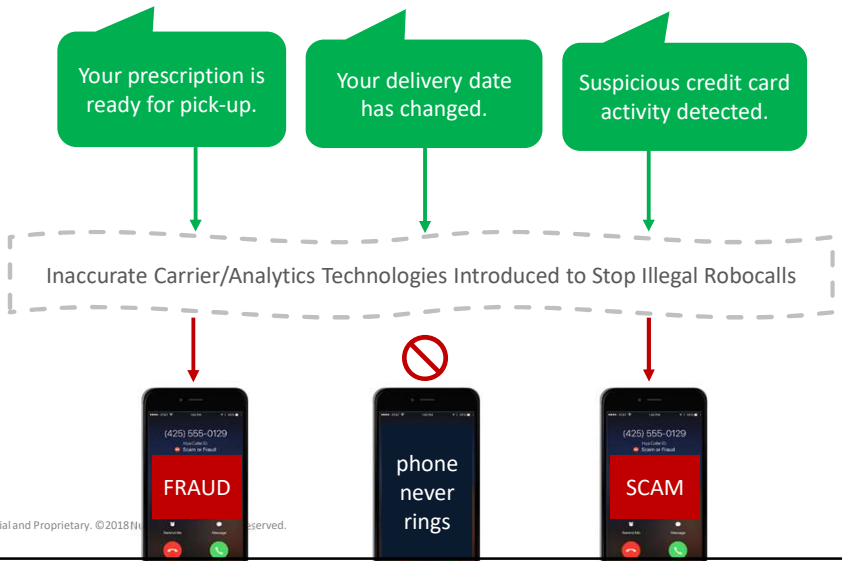
Call Blocking & Labeling



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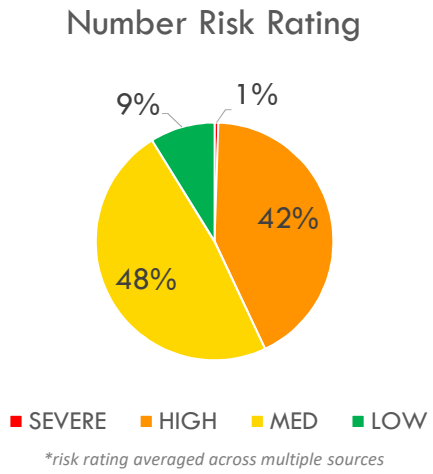
Retail/Customer Service

Call Intent:
Customer service, consumer-requested call-backs

Industry/Focus:
Home improvement retail, renovation, installation services, and supplies

Size of Organization:
Fortune 100, publicly traded



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Analytics Inconsistencies: Retail/Customer Service

Original TN	Analytics 1	Analytics 2	Analytics 3
844-83#-####	Medium	No Rating	Medium
800-46#-####	High	Low	Medium
800-24#-####	Medium	High	Medium
800-91#-####	Medium	Medium	Low
512-87#-####	Medium	Low	Medium
770-65#-####	High	Low	Medium
866-64#-####	Medium	Medium	Low

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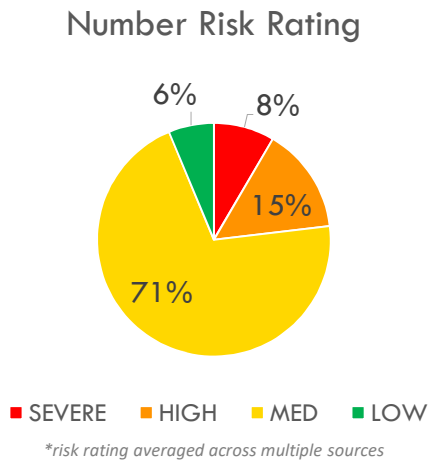
Cable/Internet Provider

Call Intent:
Account services, new customer installations, sales, upgrades

Industry/Focus:
Cable, internet, phone service

Size of Organizations:
Fortune 100, publicly traded; represents two of the largest nationwide broadcast brands



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Analytics Inconsistencies: Cable/Internet Service

Original TN	Analytics 1	Analytics 2	Analytics 3
201-25#-####	Scam	None	None
877-67#-####	High	Low	High
844-34#-####	Low	None	None
844-30#-####	High	Scam	High
844-34#-####	Scam	None	None
844-34#-####	Low	None	High
866-63#-####	Low	None	High
855-71#-####	Scam	None	High
215-70#-####	Scam	High	None

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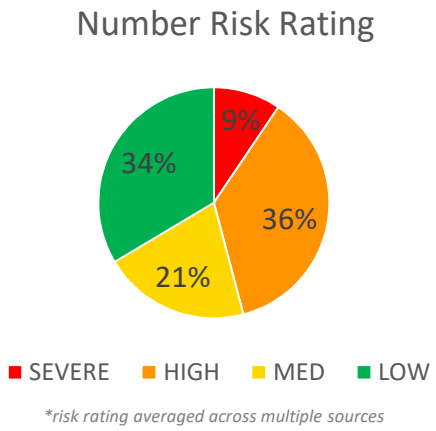
Collections/Account Resolution

Call Intent:
1st and 3rd Party Collections

Industry/Focus:
Commercial, government, and healthcare collections

Size of Organizations:
Includes 5 organizations ranging from small, privately owned to large, publicly traded entities



*risk rating averaged across multiple sources

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Analytics Inconsistencies: Account Resolution

Risk Ratings	Analytics 1 (Total TNs Ranked)	Analytics 2 (Total TNs Ranked)	Analytics 3 (Total TNs Ranked)	Analytics 4 (Total TNs Ranked)
SEVERE	7	3	6	0
HIGH	16	22	18	13
MED	13	12	0	3
LOW	14	13	16	14

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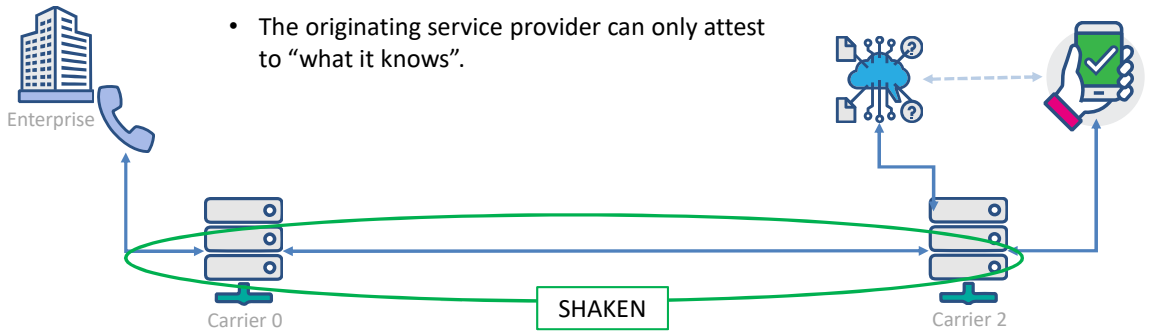
SHAKEN

- SHAKEN verifies that the entity originating a call is entitled to use the phone number displayed – nothing more!
- SHAKEN builds on the information the originating carrier has about the calling party.
- The originating service provider can only attest to "what it knows".



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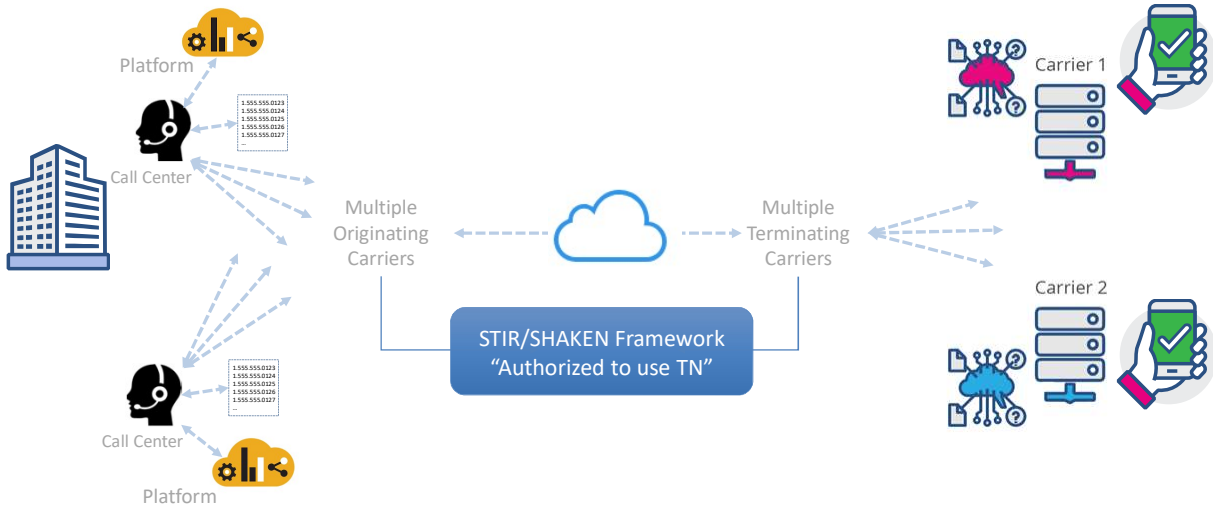
SHAKEN



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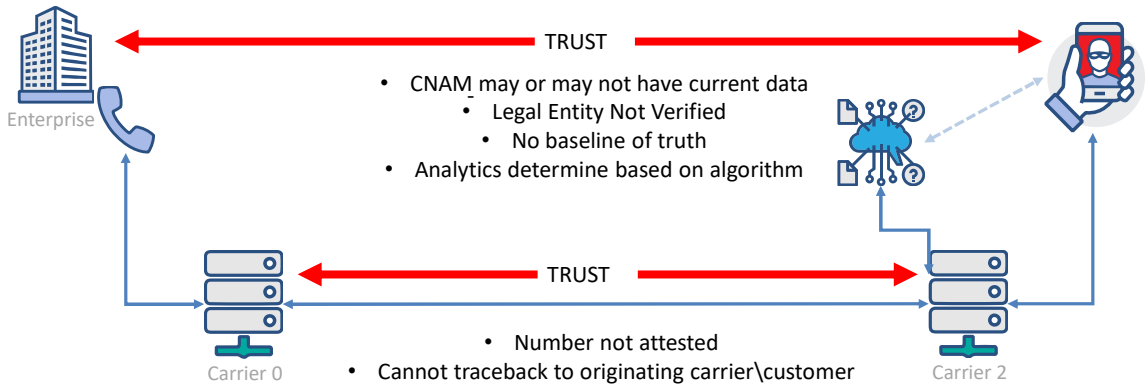
Current Ecosystem

No Trust Between
Carriers and Enterprise



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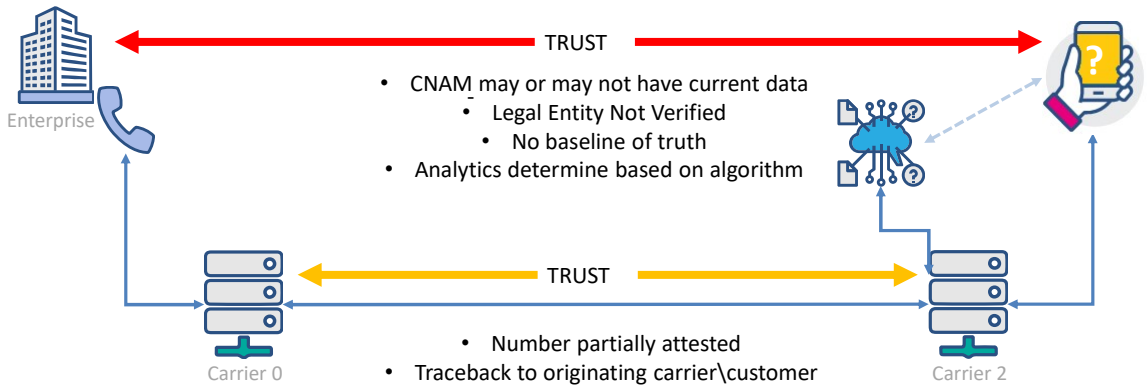
SHAKEN with Partial Attestation

Partial Trust Established Through
SHAKEN ONLY



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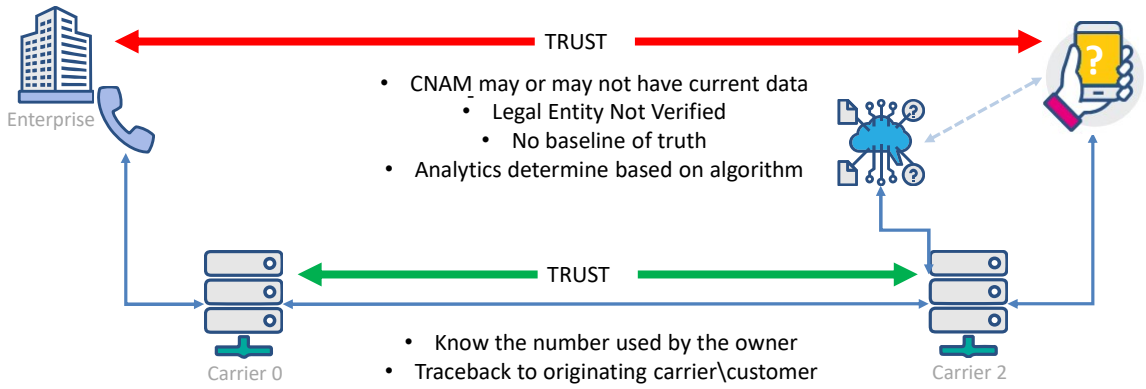
SHAKEN with Full Attestation

Trust Established Through
SHAKEN ONLY



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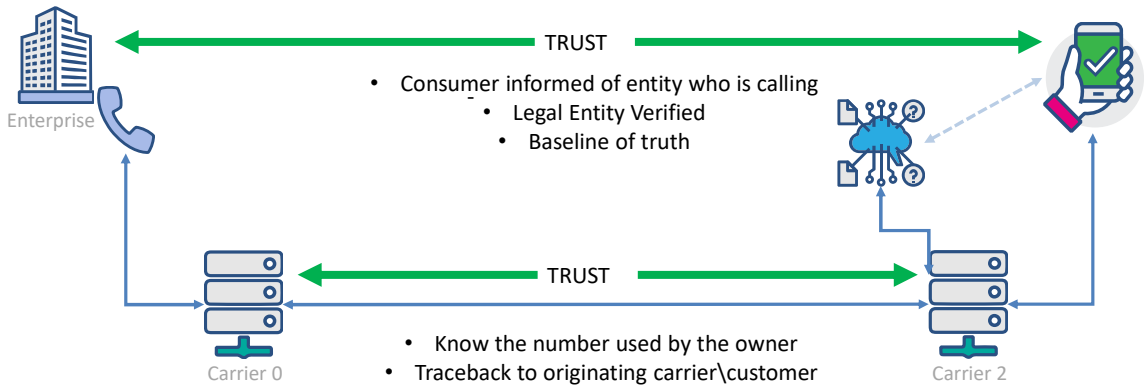
SHAKEN + Vetted Entity

Trust Established Through
Know Your Customer & SHAKEN



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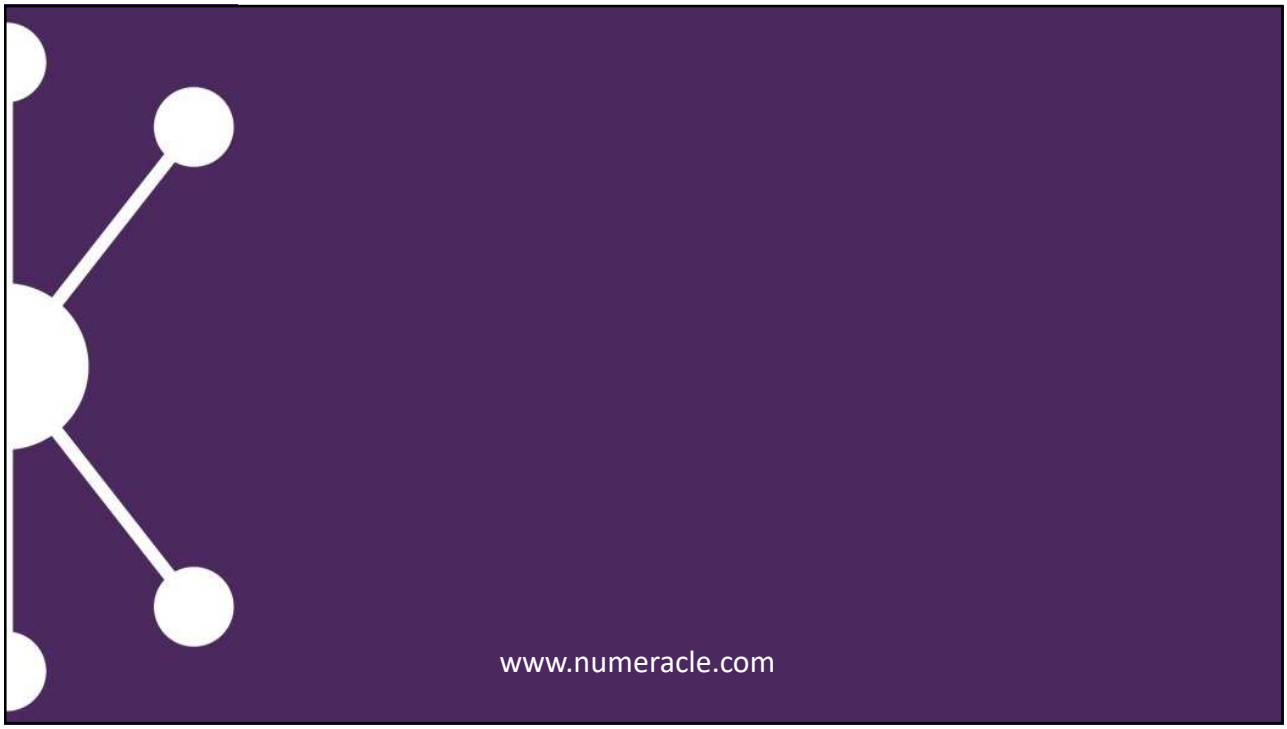

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