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May 25, 2018

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

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

Dear Ms. Dortch:

On Wednesday May 23, 2018 Scott Mullen, CTO and I of Bandwidth Inc. (“Bandwidth”) met with Eric Burger, Ken Carlberg, Sherwin Sly and Ann Stevens at the Commission’s offices to discuss Bandwidth’s efforts and perspectives on how to effectively combat illegal robocalling. We were also joined by Jerusha Burnett, John B. Adams, Heather Hendrickson, Joseph Calascione from the Commission and Tom Soroka, Director of Fraud Mitigation and Mike Nelson, Voice Service Solutions Architect for Bandwidth via conference bridge.

During our meeting we discussed Bandwidth’s participation in a number of the industry efforts to develop solutions for identifying and stopping illegal robocalling. Our discussions were particularly focused on the STIR/SHAKEN standards and Bandwidth plans for implementation as well as perceived gaps in the current set of standards. Importantly, Bandwidth believes that the industry’s efforts to accurately identify valid end-user originated traffic as distinct from illegal robocalls, will hinge critically upon the adoption of a set of Telephone Number Proof of Possession (“TN PoP”) standards and best practices. As an underlying IP-based provider of wholesale services to a wide array of innovative service provider customers large and small, Bandwidth is concerned that without the industry’s simultaneous adoption of TN PoP standards, IP-enabled services that rely upon underlying carriers will risk being improperly discriminated against. If STIR/SHAKEN traffic identification information only allows for partial attestation from underlying carriers because TN PoP is not utilized, which may otherwise allow the ability for wholesale providers to attest fully, then IP-based service providers and their end-users may be disadvantaged. Additionally, Bandwidth discussed its concerns with call analytic services that are only able to utilize call signaling information to make filtering decisions. And finally, Bandwidth discussed the importance of establishing standardized approaches to call identification delivery information to network operators and recipient end-users.

In accordance with Section 1.1206(b), this *ex parte* notification is being filed electronically for inclusion in the public record of the above proceeding. Should there be any questions or concerns regarding this filing, please direct them to the undersigned.

Sincerely,

/s/ *Greg Rogers*

Greg Rogers

cc: Eric Burger
Ken Carlberg
Sherwin Sly
Ann Stevens
Jerusha Burnett
John B Adams
Heather Hendrickson
Joseph Calascione