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May 28, 2019

VIA ECFS

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

Re: **NOTICE OF *EX PARTE* COMMUNICATION OF TRANSACTION
NETWORK SERVICES, INC.**
CG Docket No. 17-59: *Advanced Methods to Target and Eliminate
Unlawful Robocalls*
WC Docket No. 17-97: *Call Authentication Trust Anchor.*

Dear Ms. Dortch:

On May 23, 2019, Paul Florack, Vice President of Product, Jim Tyrrell, Senior Director, Product Marketing, and Lavinia Kennedy, Director, Product Management, with Transaction Network Services, Inc. (“TNS”),¹ along with outside counsel, Steven A. Augustino of Kelley Drye & Warren, LLP, met in person with various members of the Consumer and Government Affairs Bureau and the Wireline Competition Bureau regarding topics raised in the above proceedings. In attendance from the Consumer and Governmental Affairs Bureau were: Patrick Webre, Chief; Mark Stone, Deputy Bureau Chief; Ed Bartholme, Associate Bureau Chief; Christina Clearwater, Jerusha Burnett, Karen Schroeder, and Kristi Thornton (by phone). In attendance from the Wireline Competition Bureau, Competition Policy Division were: Heather Hendrickson, Assistant Division Chief (by phone); Matthew Collins, and Connor Ferraro.

¹ TNS is a leading global provider of data communications and interoperability solutions. TNS offers a broad range of network connectivity and innovative value-added services which enable transactions and the exchange of information in diverse industries such as telecommunications, payment processing, and financial services markets.

KELLEY DRYE & WARREN LLP

Ms. Marlene H. Dortch

May 28, 2019

Page 2

At our meeting TNS discussed its Identity Protection Services for identifying and protecting consumers from robocalls. TNS discussed how its Call Guardian robocall solution detects robocalls, how it detects neighbor spoofing, the methodology it uses to identify spoofed or hijacked numbers, and the data sources used by the Call Guardian solution, including crowd sourced feedback. TNS discussed the results of its 2019 Robocall Investigation Report, which was filed with the Commission in docket 17-59 on May 15, 2019.

TNS also discussed the tools that it makes available to enterprise customers and call originators to track call volumes and how their calls are processed by TNS's solutions. TNS discussed the process it has in place to address concerns raised by call originators in order to reduce false positives. TNS stated that its false positives, as measured by user reporting, are less than 0.2%.

TNS also discussed its Call Authentication Hub for SHAKEN/STIR deployments. TNS' services enable Tier 2 and Tier 3 carriers to deploy SHAKEN/STIR capabilities quickly, and provides a pre-SHAKEN/STIR solution for TDM carriers using out-of-band signaling.

Finally, TNS discussed options its carrier partners have in determining how to display TNS' Call Guardian information, stressing that carriers have discretion to determine what labels to apply to TNS' numerical scores assigned to individual calls. TNS briefly discussed its user study on the impact that display options for telephone number validation under a SHAKEN/STIR framework may have on called party responses.

The attached presentation materials were distributed and discussed at the meeting. This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,



Steven A. Augustino

Counsel for Transaction Network Services, Inc.

Attachment

cc: FCC personnel listed above