

May 30, 2019

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

Re: Declaratory Ruling, Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59, WC Docket No. 17-97 (draft released May 16, 2019)

Dear Ms. Dortch:

On May 30, Public Knowledge Senior Counsel John Bergmayer spoke with Michael Scurato from Commissioner Starks's office, to add more context to the ex parte letter that PK filed on May 29th in this docket.

The PSTN in some ways presents a model of communications networks that should be emulated. It is a single, global network, yet not an excessively centralized one. Its federated nature, where communications providers of all kinds can interconnect and interoperate should be preserved. Unfortunately its open nature has also led to problems, including robocalls. But the adoption of new security technologies should not, and does not have to change the PSTN's fundamentally open nature, and it is important that competitive carriers and services are not disadvantaged by any new regime. By way of analogy, incumbent ISPs and edge services do not have the ability to restrict new entrants from obtaining SSL certificates.¹

Additionally, PK explained that user choice and control should be paramount. It should be users, not the carrier, and not the caller, who decide what communications they want to receive.

Finally, PK does not expect the rollout of any new system to be flawless. This is why a mechanism whereby blocked callers as well as users can challenge and correct mistakes must be baked into the FCC's rules at the outset.

Respectfully submitted,



John Bergmayer
Senior Counsel
PUBLIC KNOWLEDGE

¹ See, e.g., Let's Encrypt, <https://letsencrypt.org>.