**Before the**

**FEDERAL COMMUNICATIONS COMMISSION**

**Washington D.C. 20554**

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| In the Matter of  Advanced Methods to Target and Eliminate  Unlawful Robocalls | )  )  )  ) | CG Docket No. 17-59 |
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Second Further Notice of Proposed Rulemaking

To: The Commission

**COMMENTS OF GENESYS COMMUNICATIONS LABORATORIES, INC.**

Genesys Communications Laboratories, Inc. (“Genesys”) welcomes and appreciates the Commission’s efforts to address the reassigned number issue outlined in the second notice of inquiry and fully supports the development of a repository for reassigned number information. If successful the repository will provide an enhanced opportunity for responsible parties to track and scrub their outcall databases and to and comply with requirements of the TCPA, while providing a tool to hold bad actors accountable for their destructive and abusive behavior.

Since our inception in 1990, Genesys has been a pioneer in advancing customer service. We are a leading provider of customer experience and contact center solutions. With over 3500 customers in 80 countries, Genesys orchestrates more than 100 million customer interactions every day. Genesys helps its clients power optimal customer experiences that deliver consistent, seamless and personalized experiences across all touch-points, channels and interactions.

COMMENTS

Genesys supports the Commission’s proposal that one or more database be available to provide callers with the comprehensive and timely information they need to discover potential number reassignments before making a call. The commission has sought further information of the following issues: (1) the specific information that callers need from a reassigned numbers database; and (2) the best way to make that information available to callers that want it.[[1]](#footnote-1)

To be truly effective such a repository must (a) contain all active numbers, whether associated with mobile, landline, VOIP or toll-free service; (b) include information associated with each number to allow callers to reasonably be able to confirm their status; and (c) identify “numbers in transition” with additional information appended that will allow callers to identify which transitions reflect on a subscriber’s presumed consent. In order to correctly maintain a chain of consent it is important that the reason for a deactivation be included in the database because it is common for a carrier to consider a number deactivated when it is reassigned to another carrier even though it has not been reassigned to another subscriber. Further, some deactivations are only temporary, as in the case of a late payment or temporary suspension of service. In all those cases the chain on consent remains intact because the number continues to be associated with the same subscriber. Therefore more detail is needed to correctly track the chain of consent.

Addressing the issue of how a repository should be made available Genesys supports the creation of a single FCC-established database whether administered by a third party or not. Access to the database should not be public and should be reasonably priced, reflecting the actual cost of providing the data. Genesys agrees that subscription and use of the repository should include a presumption of good faith on the part of callers, and a safe harbor from TCPA enforcement in cases where the accuracy of the database has been relied upon by callers.

Genesys appreciates efforts by the Commission to provide tools that will help eliminate unwanted and unproductive calls.

Respectfully submitted,

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Dated: June 7, 2018

1. FCC Docket 17-59 Second Further Notice of Proposed Rulemaking, Introduction, paragraph 2. (March 22,2018) [↑](#footnote-ref-1)