

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC**

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	
)	
Rules and Regulations Implementing the)	CG Docket No. 02-278
Telephone Consumer Protection Act of 1991)	

COMMENTS OF CTIA

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I. INTRODUCTION.

CTIA¹ respectfully submits these comments in response to the Federal Communication Commission’s (FCC or Commission) *Second Further Notice of Proposed Rulemaking*,² which proposes “to ensure that one or more databases are available to provide callers with the comprehensive and timely information they need to avoid calling reassigned numbers.”³

In this proceeding, the Commission has established the goals of ensuring that consumers get the calls they want, reducing unwanted calls, and mitigating Telephone Consumer Protection Act (TCPA) liability for callers acting in good faith.⁴ CTIA has consistently supported voluntary

¹ CTIA® (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry, and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

² *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Second Further Notice of Rulemaking, CG Docket No. 17-59 (rel. Apr. 24, 2018) (*Second FNPRM*).

³ *Id.* ¶ 8.

⁴ *Id.* ¶¶ 1-2.

industry and Commission efforts to reduce unwanted robocalls and to ensure that consumers receive wanted calls.⁵ CTIA and its member companies have also taken significant steps to enable consumers to combat unlawful robocalls.⁶

In these comments, CTIA suggests that the Commission can best accomplish the goals articulated in the *Second FNPRM* by encouraging good-faith callers to take advantage of increasingly robust market-based solutions and properly sequencing its pending TCPA proceedings to resolve open issues related to calls to reassigned numbers. Given the significant technical, operational and financial challenges of creating a new database of reassigned numbers, the Commission should first resolve the legal issues left open by the D.C. Circuit's *ACA International v. FCC* decision⁷ and in the Commission's *ACA Remand Public Notice*⁸ before considering whether to mandate such a database. Doing so will help ensure that the Commission can fully assess the utility and cost-benefit of any new, purpose-built database of reassigned numbers.

To further the Commission's goals in the near-term, the Commission should create a safe harbor by which a caller is not liable under the TCPA for an inadvertent call to a reassigned number if the caller reasonably relies upon a market-based TCPA compliance solution that meets certain FCC criteria. By adopting a safe harbor approach, the Commission can provide appropriate market-based incentives for TCPA compliance solutions providers to ensure that

⁵ Comments of CTIA, CG Docket Nos. 17-59, 02-278 at 4-5 (Aug. 28, 2017) (CTIA *Second NOI* Comments) (describing CTIA's past efforts to reduce unwanted calls and text messages).

⁶ *Id.*

⁷ See *ACA Int'l, et al. v. FCC*, 885 F.3d 687 (D.C. Cir. 2018).

⁸ See *Consumer and Governmental Affairs Bureau Seeks Comment on Interpretation of the Telephone Consumer Protection Act in Light of the D.C. Circuit's ACA International Decision*, CG Docket Nos. 18-152, 02-278 (rel. May 14, 2018) (*ACA Remand Public Notice*).

data is comprehensive and timely, and for callers to use these solutions to reduce unwanted calls to reassigned numbers.⁹ Consistent with longstanding precedent and the D.C. Circuit’s recent *ACA* decision, the Commission has ample legal authority under the TCPA to establish such a safe harbor.

By first addressing the reassigned numbers issues in the *ACA Remand Public Notice*, adopting a safe harbor for good-faith callers that reasonably rely upon qualifying market-based TCPA compliance solutions, and embracing a voluntary reassigned numbers reporting framework, the Commission can use market-based principles to accomplish the *Second FNPRM*’s policy objectives.

II. GIVEN THE MARKET-BASED SOLUTIONS AVAILABLE TODAY, THE COMMISSION SHOULD FIRST RESOLVE THE REASSIGNED NUMBERS ISSUES IN THE *ACA REMAND PUBLIC NOTICE* BEFORE CONSIDERING THE CREATION OF A NEW DATABASE.

In the *Second FNPRM*, the Commission seeks comment on potential approaches for service providers to report reassigned number information and for callers to access that information, including, *inter alia*, allowing service providers to report information to commercial data aggregators on a voluntary basis or requiring reporting to a single, FCC-designated database.¹⁰

As discussed below, the Commission should first resolve the reassigned numbers issues raised in the *ACA Remand Public Notice* and encourage callers to utilize existing market-based solutions before considering any new database or reporting mandates. A centralized database may have limited, if any, benefits as compared to existing commercial solutions, which have

⁹ See CTIA *Second NOI* Comments at 8 (noting that “[i]ncreased adoption will, in turn, help spur more competition among solutions providers, facilitate increased database coverage and reliability, and help reduce unwanted calls to reassigned wireless telephone numbers.”).

¹⁰ *Second FNPRM* ¶ 32.

seen a marked improvement in coverage and reliability in recent years. It also would impose significant financial, operational, and technical costs on providers, third-party vendors, and callers.

Notably, the Commission should recognize that even a new database of reassigned numbers will not reduce unwanted calls from spoofers, scammers, and other bad actors who are not incented to utilize such a database. As explained in this section, the Commission should defer considering the creation of a new, purpose-built database of reassigned numbers, and should instead focus in the near-term on creating the proper incentives for callers to utilize market-based solutions to reduce unwanted calls and mitigate TCPA liability through a safe harbor. CTIA concurs with Commissioner O’Rielly that “the most sensible option at this point” would be for the Commission “to encourage voluntary reporting to existing, commercially available databases with appropriate legal protections for those that decide to do so.”¹¹

¹¹ *Id.* at Statement of Commissioner O’Rielly.

A. The Commission Should Encourage Callers to Utilize Existing Market-Based Solutions to Mitigate TCPA Liability Risk for Calls to Reassigned Telephone Numbers.

Although the *Second FNPRM* suggests that “callers lack guaranteed methods to discover all reassignments’ in a timely manner,”¹² commercially available solutions have significantly improved since 2015, when the Commission last considered these issues. The current capabilities of these solutions should inform the Commission’s cost-benefit analysis when evaluating whether to mandate the creation of a wholly new database.

As Neustar has recently explained, the Commission’s earlier finding was based on Neustar’s promotional materials from 2013.¹³ Indeed, Neustar’s database now includes “greater than 95% of true wireless disconnects in its data and can also verify name to phone linkages on approximately 90% of wireless subscribers.”¹⁴ Neustar also described other aspects of its solution that have evolved. For example, Neustar’s reassigned numbers scrubbing was initially a value-add feature in an identity fraud solution. In recent years, however, its reassigned numbers solution has become a more robust offering that is specifically designed to help enhance TCPA compliance.¹⁵

Other solutions similarly demonstrate that there is an existing “infrastructure established that could be accessed”¹⁶ by callers and service providers, and the Commission should encourage and incentivize callers to use such services. For example, “Syniverse’s Number Verification

¹² See *Id.* ¶ 5 (citing *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, Declaratory Ruling, 30 FCC Rcd. 8007-08 ¶ 85 (2015) (*2015 TCPA Order*)).

¹³ See *Ex Parte* Letter from Richard L. Fruchterman, III, Sr. External Affairs Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, at 2 (Oct. 16, 2017).

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ See Comments of Syniverse, CG Docket No. 17-59, at 2 (Aug. 28, 2017).

Service enables callers to verify the customer contact information they have by, among other things, proactively monitoring number event changes, such as a number deactivation or reassignment.”¹⁷ And Early Warning System’s mobile number verification solution “[h]as real-time connectivity to [mobile network operators] with over 99 [percent] wireless coverage,” 97 percent landline coverage, and 93 VoIP coverage.¹⁸ As Noble Systems has observed, these validation services help “address the reassigned number problem” and “offer a relatively high level of accuracy in being able to detect whether a number for a subscriber was reassigned.”¹⁹

In evaluating the need for and efficacy of a new database, CTIA encourages the Commission to recognize that no solution—commercial or otherwise—can be 100% foolproof (including, *e.g.*, because there could be a change to the database information immediately after a caller checks that database). The more salient question is whether the new database proposals in the *Second FNPRM* are likely to significantly outperform existing commercial offerings. To that end, a variety of commenters have raised doubts about whether such performance is actually feasible.²⁰ Likewise, the Commission should recognize that none of the efforts or solutions discussed in the *Second FNPRM* or these comments will reduce unwanted robocalls from spoofers, scammers, and bad actors.

¹⁷ *Id.* at 4.

¹⁸ Mobile Number Verification, Early Warning (last visited June 3, 2018), <http://bit.ly/2idGgLx>.

¹⁹ Comments of Noble Systems, CG Docket No. 17-59, at 4 (Aug. 28, 2017).

²⁰ See Comments of Neustar, CG Docket No. 17-59, at 3 (Aug. 28, 2017) (stating that “there is no 100 percent solution or ‘silver bullet’ available when dealing with disparate and complex datasets”); Comments of ACA International, CG Docket No. 17-59, at 7 (Aug. 28, 2017) (“Even in the best of circumstances, given the huge number of reassignments that occur on a daily basis, it is hard to imagine that [a reassigned numbers] database could be one hundred percent accurate at any given time.”); Noble Systems Comments at 1 (“Due to the inherent challenges of dealing with these datasets, a reassigned numbers database would be a “complex and expensive solution that promises, at best, to be only marginally better than current number validation services.”).

B. Mandating A New Database Presents Significant Financial, Operational, and Technical Challenges for Providers, Third-Party Vendors, and Callers Without A Discernable Benefit to Consumers.

Numerous commenters have highlighted the myriad financial, operational, and technical challenges inherent to operationalizing an FCC-mandated database or reporting requirement, whether to a central database administrator or to commercial solutions providers. In his statement accompanying the *Second FNPRM*, Commissioner O’Rielly suggested that “the benefit of a new database will exceed the costs of creating it and potentially requiring service providers to keep it or other databases current. Indeed, the idea that we might impose new burdens on a wide range of providers, including those we don’t normally regulate, is something that we must be very cautious to cabin to this proceeding.”²¹

Other stakeholders concur. For example, Telcordia and the Alliance for Telecommunications Industry Solutions described the operational and technical complexities in requiring carriers to track reassigned numbers.²² Those statements align with CTIA’s concerns that neither the *2015 TCPA Order* nor the Commission’s number classification system explains fully how to categorize “reassigned numbers” within the existing numbering framework. These ambiguities could have a significant impact and burden on carriers’ existing numbering

²¹ *Second FNPRM* at Statement of Commissioner O’Rielly.

²² Comments of Telcordia, Inc. d/b/a iconectiv, CG Docket No. 17-59, at 4 (Aug. 28, 2017) (“As there are no real-time reassigned number databases to integrate with a central database, voice providers would be required to first devise their own systems and structures. Those costs and burdens would be in addition to what also would be required for the creation of operational, technical, and financial systems to implement and maintain the sort of centralized real-time number database the FCC seeks to make available to commercial callers.”); Comments of the Alliance for Telecommunications Industry Solutions, CG Docket No. 17-59, at 2-3 (Aug. 28, 2017) (disagreeing with the assumption that voice providers would not be “greatly burdened” if they were required to report disconnected and reassigned numbers. ATIS “maintains that the industry does not in fact generally track when disconnected numbers are reassigned in a way that would be useful or applicable to call authentication,” and it is “unaware of any carrier that already tracks this information for any purpose.”).

operations and systems.²³ The Chamber of Commerce also expresses “concerns about the establishment, maintenance, use, and practicality of a reassigned numbers database in any of the proposed forms and questions whether it will ultimately serve to perpetuate the abusive litigation already stemming from the outdated language of the [TCPA].”²⁴ It also notes that “the proposed database is an unwieldy solution to a problem that could be solved in a much easier fashion.”²⁵ No evidence on the record rebuts the likelihood of these costs and burdens.

Past database-related efforts are instructive. For comparison, the previous Local Number Portability Administrator (LNPA) contract cost \$466.4 million per year, and the new LNPA contract is projected to cost approximately \$142.9 million a year.²⁶ If a new database of reassigned telephone numbers has similar requirements to the LNP database, then the LNPA contract may provide the Commission with a reasonable point of reference for the cost of a new Commission-mandated database of reassigned telephone numbers. Further, the Commission would need to assess how any new database would be funded. The current costs of the LNPA are borne by telecommunications providers (and consumers) that benefit from the competition that LNP enables, whereas the benefits of a reassigned number database would accrue to consumers and callers attempting to comply with the TCPA. For this reason, the Commission should consider how and whether the costs of a reassigned number database would be sufficiently recovered by good-faith callers.

²³ *CTIA Second NOI* Comments at 12-13.

²⁴ Comments of the Chamber of Commerce, CG Docket No. 17-59, at 2 (Aug. 28, 2017).

²⁵ *Id.*

²⁶ See, e.g., *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration*, Order, 31 FCC Rcd 8406 (Jul. 25, 2016); *id.* at Statement of then-Commissioner Pai.

C. In light of the D.C. Circuit’s *ACA* Decision, the Commission Should Address the Interpretation of “Called Party” Before Assessing the Value of Any New Database Mandates Over Voluntary, Market-Based Solutions.

CTIA appreciates the Commission’s request for comment on the *ACA* decision’s impact regarding the costs and benefits of the Commission’s database proposals.²⁷ As discussed below, *ACA* fundamentally alters the cost-benefit calculus of the database approaches in the *Second FNPRM*. Given these changes, the Commission should adopt a sequenced approach and first resolve the issues raised in the *ACA Remand Public Notice* before assessing the value of any new database requirements over existing voluntary, market-based solutions.

In *ACA*, the D.C. Circuit vacated the *2015 TCPA Order* in its entirety as to reassigned numbers and the meaning of “called party.”²⁸ As described in the *Second FNPRM*, the Commission has proposed the creation of a new centralized database of reassigned telephone numbers as a potential solution to the significant liability risk created by the FCC’s *2015 TCPA Order*. However, because the D.C. Circuit struck down the Commission’s 2015 treatment of reassigned numbers, articulating a new, legal liability standard for calls to reassigned numbers should be the Commission’s priority.²⁹ In short, as *ACA* previously noted, after the Commission fixes the *2015 TCPA Order*, “then the TCPA framework will be properly aligned, legitimate businesses will have a clear pathway to TCPA compliance, and other ideas – like a reassigned number database – can be more meaningfully explored.”³⁰

²⁷ *Second FNPRM* ¶ 31.

²⁸ *See ACA Int’l, et al. v. FCC*, 885 F.3d 687 (D.C. Cir. 2018).

²⁹ *Second FNPRM* at Statement of Commissioner O’Rielly (“Now that the court has tossed out the prior Commission’s illogical approach, and made clear we can decide that callers are not liable unless they have actual knowledge that the number changed hands, there may be less value or need in creating a new database, at least from a legal liability perspective.”).

³⁰ *ACA Comments* at 7.

III. THE COMMISSION CAN AND SHOULD ADOPT A SAFE HARBOR FOR CALLERS THAT USE MARKET-BASED TCPA COMPLIANCE SOLUTIONS.

A. A Safe Harbor for Market-Based TCPA Compliance Solutions Best Effectuates the Commission's Goals.

In addition to revisiting the *2015 TCPA Order*, the Commission should adopt a voluntary reporting framework and devote its attention in the near term to creating incentives to enhance existing market-based solutions that will help good-faith callers reduce unwanted calls to reassigned telephone numbers. At a minimum, there should be a safe harbor for callers who use one or more of the market-based TCPA compliance solutions available today.

The *Second FNPRM* seeks comment on the parameters and structure of a safe harbor.³¹ The Commission should establish a rule such that a caller that checks a “covered compliance solution” within a “covered period” (*e.g.*, a few weeks) would not be liable for inadvertent calls to reassigned numbers.³² Under this approach, the FCC’s rules would codify the criteria for what qualifies as a “covered compliance solution.” These criteria would help provide meaningful assurances as to the coverage and accuracy of marketplace solutions while incentivizing callers to subscribe and reduce the number of unwanted calls to reassigned numbers. For example:

- A “covered compliance solution” could be defined to include solutions that receive information about “disconnects” from entities that assign telephone numbers from the North American Numbering Plan Administration (NANPA) to consumers and communicate that information to callers.
- Any reassigned number information that a “covered compliance solution” communicates to a caller must be current as of a certain time period (*e.g.*, several weeks) after a number’s disconnect.

³¹ *Second FNPRM* ¶ 57.

³² For example, the Commission may ground this safe harbor based on an interpretation that “called party” means “intended” or “expected” recipient. See below for more on the Commission’s legal authority to adopt a safe harbor.

- The Commission could develop best practices for interoperability to help ensure that “covered compliance solutions” have consistent protocols for communicating disconnect information.

As these are just a few examples of potential criteria, CTIA looks forward to reviewing the record and welcomes a dialogue with interested stakeholders on these or other potential criteria for compliance solutions that may qualify for safe harbor treatment.

Most importantly, this proposal would involve no FCC-issued mandates on carriers or vendors. Rather, *if* a vendor seeks to qualify as a “covered compliance solution,” *then* it must meet the FCC’s standards. Moreover, *if* a caller seeks to avail itself of the safe harbor, *then* it must consult a “covered compliance solution.” At the same time, callers should not be required to subscribe to a safe harbor solution to establish their compliance with the Commission’s TCPA rules. A safe harbor should be just that—sufficient to comply with the Commission’s TCPA rules, but not necessary to avoid non-compliance with those rules.

B. The Commission Has Ample Authority to Adopt a Safe Harbor by Reasonably Interpreting the TCPA.

The *Second FNPRM* seeks comment on the Commission’s statutory authority to adopt a safe harbor.³³ As discussed below, the Commission has ample authority under the TCPA to adopt the safe harbor that CTIA has outlined above, and such a safe harbor would be similar to other TCPA compliance frameworks that the Commission has adopted in the past.

The Commission has numerous statutory tools to adopt a safe harbor. For example, the Commission possesses sufficient legal authority to reasonably interpret “called party,” as the D.C. Circuit’s *ACA* decision confirmed when it made clear that the term is ambiguous and susceptible to, *e.g.*, interpretations that mean “intended” or “expected” recipient or “current

³³ *Second FNPRM* ¶ 57.

subscriber.”³⁴ The Commission may reasonably determine that “called party” means “intended” or “expected” recipient, and that when a caller checks one or more database(s) but nevertheless reaches a reassigned number inadvertently, the caller does not violate the TCPA because it has established that it “intended” or “expected” to reach the prior subscriber (who had granted consent).

The Commission also has statutory authority to adopt a safe harbor as part of a reasonable interpretation of the ambiguous phrase “prior express consent.” The Commission has repeatedly found that the term “prior express consent” is ambiguous under step one of *Chevron*, and it has previously adopted safe harbors and similar protections against liability when interpreting the term.³⁵ In fact, even the 2015 Commission rejected a strict liability regime for calls to reassigned numbers because the outcome would be “severe” and “demand the impossible.”³⁶ The D.C. Circuit did not invalidate the FCC’s decision, as a general matter, to provide some safe harbor and reject a strict liability approach to reassigned numbers. These statutory bases for legal authority further underscore the necessity of resolving the *ACA Remand Public Notice*, which implicates the proper interpretation of “called party” and “reasonable reliance,” before the Commission assesses the *Second FNPRM*’s proposals to mandate new database or reporting requirements.

³⁴ *ACA Int’l*, 885 F.3d at 706-07.

³⁵ See, e.g., *2015 TCPA Order* ¶ 75 (employing the concept of “reasonable reliance” in construing “prior express consent” when it found that a caller can rely on the consent given by a wireless number’s “customary user” (“such as a close relative on a subscriber’s family calling plan”) rather than by the subscriber herself.); *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, Declaratory Ruling, 27 FCC Rcd. 15391 ¶¶ 1 11 (2012) (clarifying that sending a one-time text message confirming a consumer’s request that no further text messages be sent does not violate the TCPA when certain conditions are met).

³⁶ *2015 TCPA Order* at n.312.

The Commission's past TCPA decisions also support the position that a safe harbor, grace period, or clarification would not impermissibly contravene the statute's private right damages provisions. While the FCC arguably cannot restrict certain remedies for a TCPA violation, it can reasonably interpret ambiguous provisions of the statute and clarify what conduct may or may not rise to the level of a violation.³⁷

IV. CONCLUSION.

The record has made clear that the Commission should proceed cautiously as it considers the proposals in the *Second FNPRM*. Before considering whether to mandate a new, purpose-built database of reassigned telephone numbers, the Commission should first revisit the *2015 TCPA Order* and resolve the open issues raised in the *ACA Remand Public Notice*. To accomplish the goals articulated in the *Second FNPRM* in the near-term, the Commission should adopt a safe harbor for good-faith callers that check market-based TCPA compliance solutions and embrace a voluntary reassigned numbers reporting framework. By doing so, the Commission can use market-based principles to support its objectives of incentivizing good-faith callers to reduce unwanted calls and mitigate TCPA liability exposure, and ensuring that consumers receive the calls they want.

³⁷ In addition, the Commission may have other statutory bases to adopt a safe harbor. For example, a safe harbor is materially similar to "grace periods" that the Commission has adopted for callers to "come into compliance" with the FCC's TCPA rules. See, e.g., *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278, Order, 19 FCC Rcd 19215 ¶ 7 (2004) (providing a 15-day grace period for landline-to-wireless porting).

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