

**BY ELECTRONIC FILING**

June 14, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 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.*

Ms. Dortch:

On June 12, 2019, Lavinia Kennedy, Director, Product Management with Transaction Network Services, Inc. (“TNS”),<sup>1</sup> met in person with Mr. Zenji Nakazawa, Legal Advisor, Public Safety and Consumer Protection, Office of Chairman Pai. At that meeting TNS provided an overview of TNS Identity and Protection Services with a focus on how its Call Guardian robocall solution deployed at 4 of the top 6 Wireless providers 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 also discussed its Call Authentication Hub for SHAKEN/STIR that enables Tier 2 and Tier 3 carriers to deploy SHAKEN/STIR capabilities, and that provides a pre-SHAKEN/STIR solution for TDM carriers using out-of-band signaling. TNS explained that its partnership with Metaswitch for the Call Guardian Authentication Hub allows it to quickly deploy the capabilities of the Call Guardian Authentication Hub to a wide array of wireline, Tier 2 and Tier 3 carriers. At the meeting TNS presented the attached slide showing the TNS Analytics Engine that underlies both its Call Guardian robocall solution and its Call Guardian Authentication Hub.

Finally, TNS expressed its desire to participate in stakeholder discussions at the FCC’s upcoming SHAKEN/STIR Robocall Summit on July 11, 2019. TNS explained that at the SHAKEN/STIR Robocall Summit it can present insights on: (1) challenges to SHAKEN/STIR deployments faced by smaller voice service providers whose networks are not yet IP enabled, and lessons learned from helping small to medium size providers deploy SHAKEN/STIR

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<sup>1</sup> 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.

through the TNS Call Guardian Authentication Hub; and (2) the effective use of the Call Guardian Authentication Hub to reduce spoofed robocalls and improve the consumer's calling experience.

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,

A handwritten signature in black ink that reads "Michael R. McCarthy". The signature is written in a cursive, flowing style.

Michael R. McCarthy  
SVP, Assistant General Counsel  
Transaction Network Services, Inc.

Attachment

cc (via email): Mr. Zenji Nakazawa, Legal Advisor,  
Public Safety and Consumer  
Protection, Office of Chairman Pai

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