

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of the                    )  
Rules       and       Regulations    )  
Implementing the Telephone    )   CG Docket No. 02-278  
Consumer Protection Act of    )  
1991                                    )

Submission for the Record of Joe Shields on The Northstar  
Alarm Services LLC Petition For Expedited Declaratory  
Ruling on Soundboard Technology

Before the Commission goes off on yet another  
misguided human intervention exception to the TCPA I would  
like to provide the Commission with some transcripts of  
Soundboard technology robocalls I have received the last  
few months. Notably, there has been a significant uptick in  
soundboard technology robocalls after the Northstar  
petition submission. Most of the below soundboard robocalls  
came after the Northstar petition was filed with the  
Commission.

Healthcare Soundboard Robocalls

Date	Time	CID	Transcript	Notes
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03/26/19	09:51 a.m.	3233752069	<p>"Hello this is Donna. How are you?"</p> <p><b>Who... Donna who?</b></p> <p>I'm calling from ... My name is Donna Harris. I'm calling because you went on line looking for health insurance and we can help you find coverage with lower premiums. Are you still looking for health insurance?</p> <p><b>"Is this an avatar thing where someone is pushing buttons and playing recordings?"</b></p> <p><b>Call is disconnected</b></p>	<p>Avatar type call initiated from the far east.</p> <p>Calling CID 3233752069 reaches the same Avatar intro recording Hello this is Donna.</p> <p>The response to my questions of "who is this?" was the generic health enrollment center or adding you to the do not call list. No live person ever came on the line.</p>
04/26/19	05:42 p.m.	2814616687	<p>Hi this is Heather from Health Choice America. I'm calling because I see at one point you were looking for a health insurance quote. I'd love to help you out with that. Would you be interested to see what I can do for you?</p> <p><b>Yes</b></p> <p>"Perfect I just need to ask one question to start are you under the age of sixty five?"</p> <p><b>Yes</b></p> <p>"Fantastic please hold a moment while I transfer you to your health specialist."</p> <p>Blip</p> <p><b>Hello... Call is disconnected</b></p>	<p>Spoofed active local number.</p>

06/10/19	01:37 p.m.	4088567974	<p>"Hello this is Lauren Cole how are you today?"</p> <p><b>Who is this?</b></p> <p>"My name is Lauren Cole well I am calling about health insurance plans that have lower premiums and give you full coverage um we can explain why our plans and pricing is the best in the industry in just a few minutes okay?"</p> <p><b>Shut up and put a real person on the line stop pushing buttons.</b></p> <p>"I'm..."</p> <p><b>Call is disconnected</b></p>	<p>Avatar type call initiated from the far east.</p> <p>Calling CID 4088567974 reaches the same Avatar intro recording Hello this is Laurant Cole.</p> <p>The response to my question of "who is this?" was the generic name health enrollment center or adding you to the do not call list. No live person ever came on the line.</p>
06/17/19	11:57 a.m.	8594951060	<p>"Hello this is Lisa how are you?"</p> <p><b>Who is this?</b></p> <p>"My name is Lisa Thomas."</p> <p><b>Why are you calling?</b></p> <p>"Well we can help you find affordable health insurance options that will take care of your needs and budget I just need to ask you a few quick questions okay?"</p> <p><b>No shut the f#^K up and stop pushing buttons.</b></p> <p>"Bye"</p>	<p>Avatar type call initiated from the far east.</p> <p>Calling CID 8594951060 reaches the same Avatar recordings: "Hello this is Lisa thanks for calling back how are you today?"</p> <p>I ask why are you calling numbers on the national no call list.</p> <p>"We can help you... adding you to the do not call list" call is disconnected. Calling CID again and it now reaches a recording saying the number is not in service.</p>

06/20/19	12:41 p.m.	2814412777	<p>"Hi my name is Olivia I'm calling from health care solutions. How are you doing today?"</p> <p><b>Bullshit</b></p> <p><b>Call is disconnected.</b></p>	Avatar type call initiated from the far east.
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#### Air Duct Cleaning Soundboard Robocalls

Date	Time	CID	Transcript	Notes
02/18/19	05:28 p.m.	2816544955	Not recorded.	Avatar type call initiated from the far east.

#### Charity PAC Scam Soundboard Robocalls

Date	Time	CID	Transcript	Notes
06/14/18	02:29 p.m.	2819848797	<p><b>Hello</b></p> <p>"Hello is Cindy there?"</p> <p><b>Who is this?</b></p> <p>"Hi this is Paul Jackson with U.S. Troopers and Police Program. The reason for the calls we're setting up for our annual support drive..."</p> <p><b>Hey! Hey!</b></p> <p>"supporting legislation that punishes criminals..."</p> <p><b>Hey! You called a cell phone you know that? Call is disconnected.</b></p>	<p>Avatar type call initiated from the far east.</p> <p>Asked for spouse on my cell phone number.</p> <p>PAC collecting donations for law enforcement - scam!</p>

06/12/19	01:37 p.m.	2819848797	<p><b>Hello</b></p> <p>"Hello may I speak to Shane?"</p> <p><b>Why?</b></p> <p>"Well perhaps you can help me this is Brian with the American Law Enforcement United Alliance I just wanted to call out today to remind everyone what you can offer in the annual support drive to the officers..."</p> <p><b>You called a cell phone.</b></p> <p>"in twenty..."</p> <p><b>Shut the f@&amp;k up this is a cell phone. Do you have permission...</b></p> <p>"I'm sorry about that maybe you can help me..."</p> <p><b>Do you have permission to call this number?</b></p> <p>"Well okay thank you for your time I want to let you know this call was paid for by the American Law Enforcement United Alliance eight five five six one one three one three one<sup>1</sup> not authorized by any candidate or candidates committee thank you and have a great day."</p> <p><b>Call is disconnected.</b></p>	<p>Avatar type call.</p> <p>PAC collecting donations for law enforcement - scam!</p> <p>Calling CID 2819848797 reaches recording - press one to be removed from calling list.</p>
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#### Medical Alert Soundboard Robocalls

Date	Time	CID	Transcript	Notes
05/29/18	09:33 a.m.	2817046016	<p><b>Hello</b></p> <p>"Hi this is Todd with the</p>	<p>Avatar type call initiated from the far east to my</p>

<sup>1</sup> The telephone number is spoken so fast that no one could capture it without having a recording of the call.

		<p>fulfillment department. Your wellness package is ready to be shipped. Please press one and hold the line to receive a medical alert system. One out of every three Americans that are over sixty five fall every year in the US and that fall may be the last. Don't be a statistic. Press one now to receive a medical alarm at no cost. Press one now or press nine to opt out."</p> <p><b>One key tone</b></p> <p>"Thanks for taking a few minutes for me today and I hope your day is going okay so far. Well I have some really good news today you have been preselected to receive a state of the art completely mobile medical alert system."</p> <p><b>BS</b></p> <p>"a value of four hundred dollars..."</p> <p><b>BS</b></p> <p>"...comes at no cost to you no before I get into the details I just need to verify a couple of things for the research department responsible for this promotion first are you disabled or use a cane or a walker?"</p> <p><b>BS</b></p> <p>"Any other major health issues?"</p> <p><b>BS</b></p> <p>"Ah I'm really sorry to hear that and do you live alone?"</p> <p><b>BS</b></p>	<p>cell phone number. The call starts out as a single robocall then transitions to the avatar part of the call. No human being came on the line despite my repeated BS responses to the Avatar snippets</p>
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			<p>"All right thanks for that information now are you familiar with how a medical alert system works?"</p> <p><b>BS</b></p> <p>"Okay well our system latest technology is very small mobile and can be used anywhere in the US can I take a minute to go through that with you?"</p> <p><b>BS</b></p> <p>"Oh thank you the way it works is simple if you or a family member has a medical emergency..."</p> <p><b>BS</b></p> <p>"...like a fire or a burglary even something so simple as a fall that you have difficulties getting up from..."</p> <p><b>BS</b></p> <p>"...you simply push the button on this light weight water proof pendant and speak hands free from anywhere in the home to a live operator a fully trained medical dispatcher who has all your important contacts and medical information on file they... they will attempt communication with you that will evaluate your situation and immediately get help for you."</p> <p>This goes on and on with me repeating BS for 5:29 minutes.</p> <p>"Can you say and spell your first and last name for me so I can verify it please?"</p> <p><b>BS BS BS</b></p>	
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			<p>"Would you slowly spell your first name?"</p> <p><b>BS BS BS</b></p> <p>"Thanks so much you have a nice day."</p> <p><b>Call is disconnected</b></p>	
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### Reverse Mortgage Soundboard Robocalls

Date	Time	CID	Transcript	Notes
02/18/19	05:28 p.m.	2816544955	<p><b>Hello</b></p> <p>"Hello this is Albert with Reverse Mortgage Solutions. How are you?"</p> <p><b>Yah Reverse Mortgage Solutions?</b></p> <p>"Yes. I'm with Reverse Mortgage Solutions and based on our records it shows your you may be eligible to receive a reverse mortgage. Are you the homeowner?"</p> <p><b>Yah.</b></p> <p>"Are you sixty two years of age or older?"</p> <p><b>Yah.</b></p> <p>"Do you currently have a mortgage balance on your home?"</p> <p><b>Yah.</b></p> <p>"Okay great it does look like you qualify. The next step is to get you over to one of our reverse mortgage specialist to go over your options with you. Hold on for just a second."</p> <p><b>Call is transferred to a live person - an Angel from</b></p>	Avatar type call initiated from the far east. Soundboard is used in place of live Indian prequalifier.



		Reverse Mortgage Solutions. When I ask how this Reverse Mortgage Solutions can be reached the caller terminated the call.	
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In my opinion and with my experiences with this soundboard technology most of the Soundboard robocalls I have received there is no human on the line. The soundboard autodialer is using artificial intelligence to respond with recordings based on what the artificial intelligence can interpret. See for example my repeated BS responses and the soundboard dialer happily keeps playing recording snippets.

The Commission should cite and fine the petitioner for their blatant and massive violations of the TCPA. At a minimum the Commission must deny the petition and close yet another attempt to circumvent the TCPA.

Respectfully submitted.

/s/

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