

June 23, 2018

To: FCC, Proceeding 18-152

The increasing intrusion of robocalls into our personal and professional lives has become untenable. I admit that I am not an expert in the nuanced pros and cons for legitimate and illegitimate use of autodialers. That said, I strongly suspect there are a number of better and more appropriate ways to regulate robocalls and I call on the FCC to explore options that both protect consumers and provide the necessary flexibility for legitimate use.

Several factors to consider:

- * The cost of lost productivity to the millions of citizens that are affected by robocalls on a daily basis. These intrusions affect businesses as well as individuals. This is likely a negative drag on the economy.
- * The risk of abuse and exploitation of our critical telecommunication infrastructure. Malware and cybersecurity on the internet are a major economic drag on our economy as well as a threat to our country. Our telecommunications systems are vulnerable in similar and/or different ways. Witness the issues with telephone scams. The IRS and other organizations issue regular warnings about falling prey to this type of abuse. Spoofing of phone numbers is a symptom of deeper problems that were not anticipated when the systems were designed. These issues need to be addressed.
- * The health and financial cost of scams that prey on those that can lead afford it. This translates to higher costs for society and is a negative drag on the economy.

A few uneducated thoughts:

- * Require telecom providers to provide a simple way for callees to flag a received call for investigation. For example - pressing a short key sequence while the call is in process. The metadata would then be flagged in a database that could be processed to aggregate and analyze issues, track down abuse and disable/prosecute bad actors.
- * Extend caller ID to incorporate information that telecom providers can trace back to source, regardless of efforts to spoof information.
- * Increase the transaction cost to callers to discourage abuse.
- * Require autodialing equipment to clearly state an ID at the beginning of a call that uniquely identifies the caller, and allow callees to report abuse and violations. The ID would also be tracked through the network so that providers could block calls from bad actors and tampered equipment.
- * Prohibit spoofing within the network, but allow the network to substitute a number for a registered alternative, somewhat like DNS lookup. This would allow a legitimate caller to display a different call back number, but disallow bad actors from faking their source. If someone calls a displayed number and does not reach the intended source, provide a simple way for this to also be reported.

An overhaul of our telecommunications infrastructure, including autodialers, telemarketing, scams, etc. is appropriate and necessary. The FCC should lead the way in bringing all stakeholders together to propose and debate these issues. The thoughts above may not be viable or practical, but there are certainly ways to address not only robocalls,

but also other telecommunications infrastructure abuse. Current technologies like machine learning and big data could be productively deployed to address many of these issues, if the underlying infrastructure provided the necessary support.

Addressing these issues in a comprehensive way will improve our lives, our infrastructure, and our economy.

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