



Linda S. Vandeloop
AVP
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, NW
Suite 1000
Washington, D.C. 20036

T: 202-457-3033
linda.vandeloop@att.com

June 24, 2021

Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Ex Parte Submission

RE: In the Matter of Call Authentication Trust Anchor WC Docket No. 17-97

Dear Ms. Dortch:

On June 22, 2021, Joan Marsh, Executive Vice President – Federal Regulatory Relations, AT&T, talked to Umair Javed, Acting Chief Counsel for Acting Chairwoman Rosenworcel via telephone to express AT&T’s strong support for CTIA’s Petition for Partial Reconsideration of the Second Report and Order¹ in the Call Authentication Trust Anchor docket, with respect to the provision that prohibits U.S. intermediate providers and terminating voice service providers from accepting any voice traffic directly from any foreign voice service provider that does not appear in the Commission’s robocall mitigation database.

AT&T’s status as a leader and innovator in the fight against illegal and unwanted robocalls continues and is well documented in the Commission’s record.² However, in order to continue our industry-wide fight against the scourge of illegal robocalls, the Commission’s rules must account for the challenges of imposing requirements on carriers from countries across the globe and outside of the Commission’s jurisdiction, with workforces not familiar with the Commission’s systems or used to reviewing technical documents in English.

For these reasons, CTIA’s concern that “foreign service providers that interconnect with U.S. providers would likely fail to register in a timely manner with the robocall mitigation database”³ appears to be becoming a reality. Despite AT&T’s extraordinary efforts to educate its foreign service provider partners, as of June 23, 2021, approximately only 20 percent of foreign providers that use telephone numbers that pertain to the U.S. to send voice

¹ See Petition of CTIA for Partial Reconsideration, Call Authentication Trust Anchor, WC Docket No. 17-97 (filed Dec. 17, 2020)(“*CTIA Petition*”); see also AT&T Reply Comments to CTIA Petition. .

² See AT&T Now Blocking or Labeling More Than 1 Billion Robocalls Per Month at <https://about.att.com/story/2021/robocalls.html>

³ CTIA Petition at 5.



traffic to AT&T subscribers in the U.S. have successfully registered in the FCC's Robocall Mitigation Database. AT&T has sent out multiple notices to its international partners. Many are still struggling to understand the requirements and others have run into technical problems registering. To assist international providers with registration, AT&T is responding to a growing number of questions daily. Just yesterday a member of my team had 16 e-mail inquiries on this issue before noon. For example, at least three foreign voice service providers are encountering difficulties registering for an FRN and one was denied access to the system because they are registering from a destination sanctioned by the Bureau of Industry and Security.

While it may still be too early to affirmatively state that a large number of foreign voice service providers will fail to register before the September 28, 2021 deadline, we believe we have sufficient evidence to support CTIA's concern. It is not too early for the Commission to take steps to assist the industry in its outreach to international providers and to consider a conditional extension of the September 28th date to begin blocking calls from foreign voice service providers not listed in the Robocall Mitigation Database. Without such action there is real risk that legitimate calls will be blocked.

In accordance with section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Linda Vandeloop".

Linda Vandeloop

cc: Umair Javed