

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Protecting Consumers from)	CG Docket No. 20-93
One-Ring Scams)	
)	

REPLY COMMENTS OF CENTURYLINK

I. INTRODUCTION

CenturyLink¹ submits these reply comments in response to the Federal Communications Commission’s (“Commission”) Notice of Proposed Rulemaking (“NPRM”)² concerning additional steps that can be taken to protect consumers from one-ring scams. CenturyLink agrees with those commenters that explain how addressing one-ring scams is not materially different than addressing illegal robocall scams generally and, as a result, does not warrant unique mitigation tools. CenturyLink concurs that a broad safe harbor for call blocking based on reasonable analytics would be useful to help further encourage service providers to block these illegal calls where warranted and protect consumers. Finally, CenturyLink does not support adopting new measures such as requiring gateway providers to verify the “nature or purpose” of a call with the foreign originator before initiating service or other new requirements, as these measures are not likely to be an effective means of mitigating this problem.

¹ These reply comments are filed by and on behalf of CenturyLink, Inc. and its subsidiaries.

² *Protecting Consumers from One-Ring Scams*, CG Docket No. 20-93, Notice of Proposed Rulemaking, FCC 20-57 (rel. Apr. 28, 2020) (“NPRM”).

II. EXISTING ROBOCALL MITIGATION TOOLS CAN EFFECTIVELY ADDRESS ONE-RING SCAMS

As several commenters observe, the industry has multiple tools in its collective arsenal to combat one-ring scams. One-ring scams have distinct characteristics – namely a high volume of calls with an extremely short duration and a very low answer rate – that lend themselves to more ready identification through reasonable analytics tools than other more complex and pernicious schemes.³ CenturyLink and others are leveraging their analytics expertise to monitor networks for this type of traffic and neutralize these one-ring scams by blocking illegal traffic where appropriate. In addition, the Industry Traceback Group (“ITG”) led by USTelecom provides another proven and highly effective means to stop the flow of this illegal and harmful traffic to consumers. To help make these existing strategies even more effective, the Commission should encourage the development of voluntary best practices to battle one-ring scams and other illegal and unwanted robocalls.⁴

CenturyLink agrees that the Commission can further encourage voice service providers to continue to block illegal calls by granting providers a broad safe harbor from liability that is based on the use of reasonable analytics so as to protect legitimate calls.⁵ While existing call blocking authority is sufficient to encompass blocking for one-ring scams,⁶ CenturyLink

³ See, e.g., AT&T Comments filed in CG Docket No. 20-93 on June 19, 2020 at 9-10. (“AT&T Comments”)

⁴ CTIA Comments filed in CG Docket No. 20-93 on June 19, 2020 at 3-5. (“CTIA Comments”).

⁵ See USTelecom Comments filed in CG Docket No. 20-93 on June 19, 2020 at 3 (“USTelecom Comments”). It appears the Commission is poised to adopt a partial safe harbor which will provide some welcome relief in this area: <https://docs.fcc.gov/public/attachments/DOC-365166A1.pdf>. The broader a safe harbor is, the more carriers will be positioned to utilize call blocking technology.

⁶ See, e.g., CTIA Comments at 6 and AT&T Comments at 10 (noting the obligation to complete calls applies only to legal calls).

supports those commenters that describe how a broad safe harbor could help mitigate potentially ongoing concerns about blocking legitimate calls. CenturyLink does not see the need for a safe harbor that would be specific to this relatively narrow purpose,⁷ however, and believes a broader, more flexible approach to one-ring scams represents a better policy that would be more successful at mitigating illegal robocalls and associated scams overall. As robocallers are notorious for changing up their tactics to avoid detection and keep perpetuating their scams, safe harbors and other mitigation measures that are too targeted may not be sufficiently adaptable to be most useful and effective.

CenturyLink, however, questions whether some of the new measures proposed in the NPRM to narrowly target these schemes would be effective and efficient. CenturyLink shares concerns raised by T-Mobile regarding whether providers should be required to verify the “nature and purpose” of calls with a foreign originator.⁸ CenturyLink agrees that this type of requirement is not likely to be successful since bad foreign actors are unlikely to be truthful about the “nature and purpose” of their calls, and as a result, this step would be of questionable effectiveness.⁹ Know-your-customer practices can provide similar value¹⁰ and would be preferable given their broader benefits in the larger fight against illegal robocalls as well.¹¹ Similarly, CenturyLink does not support the NPRM’s proposal to require voice service providers

⁷ NPRM ¶ 17. *See also* CTIA Comments at 5-6 (expressing support for a broad call blocking safe harbor over a narrow safe harbor that would specifically address one-ring scams).

⁸ NPRM ¶¶ 20-21. Comments of T-Mobile USA, Inc. filed in CG Docket No. 20-93 on June 19, 2020 at 5 (“T-Mobile Comments”).

⁹ T-Mobile Comments at 5.

¹⁰ *See* Comments of INCOMPAS filed in CG Docket No. 20-93 on June 19, 2020 at 7.

¹¹ *See* ATT Comments at 5 (describing how the USTelecom robocall mitigation proposal would be effective to combat one-ring scams).

to notify customers when they dial an international-toll generating number that charges may be incurred before connecting the call.¹² While CenturyLink has features available to its customers to block their ability to make international toll calls, CenturyLink is not able to provide the specific type of alert on international calls described in the NPRM so would oppose this requirement. To the extent the Commission further pursues this type of functionality, CenturyLink urges the Commission to take a flexible approach that encompasses the wide range of offerings voice service providers make available to their customers and does not impose undue costs or burdens on service providers.

III. CONCLUSION

CenturyLink appreciates the opportunity to provide input on the NPRM's proposals and looks forward to continuing its partnership with the industry and the Commission to reduce the harms associated with one-ring scams and all illegal robocalls.

Respectfully submitted,

CENTURYLINK, INC.

By: /s/ Jeanne W. Stockman
Jeanne W. Stockman
CenturyLink
14111 Capital Boulevard
Wake Forest, N.C. 27587
984-237-1330
Jeanne.w.stockman@centurylink.com

Its Attorney

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¹² NPRM ¶ 16.