

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

In the Matter of)
)
Protecting Consumers from One-Ring Scams) CG Docket 20-93
)

REPLY COMMENTS OF VERIZON¹

Verizon strongly supports the Commission’s commitment to protect consumers from one-ring scams.² To achieve that goal, the Commission should expand service providers’ existing blocking authority. For example, it should issue a safe harbor that covers explicitly any legal calls that a service provider may inadvertently block via a carrier-initiated blocking program that relies on reasonable analytics. And the Commission should continue to focus industry’s efforts to implement STIR/SHAKEN in ways that will benefit consumers and restore trust in Caller ID; that means rejecting T-Mobile’s misguided proposal to require gateway service providers to sign calls at international gateways with “C” attestations.

I. VERIZON AND OTHER VOICE SERVICE PROVIDERS ARE STOPPING ONE-RING SCAMS AND PROTECTING CONSUMERS FROM FRAUD.

To significantly reduce the chance that one-ring scams impact our customers, Verizon continuously monitors its network for suspected one-ring scams using sophisticated analytics tools developed by Verizon's network engineers and data provided by our analytics partner, Transaction Network Services (TNS). Verizon’s algorithms hunt for suspicious calling patterns

¹ The Verizon companies participating in this filing (“Verizon”) are the regulated, wholly-owned subsidiaries of Verizon Communications Inc.

² See *Protecting Consumers from One-Ring Scams*, Notice of Proposed Rulemaking, CG Docket No. 20-93, FCC 20-57, at para. 2 (released April 28, 2020).

created by foreign calling parties seeking to take advantage of consumers with one-ring scams. Within minutes of an active one-ring campaign being identified by network algorithms, analytics, or customer feedback, subsequent incoming calls made by the scammer can be blocked, so that our customers do not receive the solitary ring (which might elicit a return call in response and subject the customer to international rate fraud).

Verizon also goes a step further to protect its customers from one-ring scams by preventing customers that receive one-ring calls from calling back the international number that was transmitted with the call. That prevents the customer from inadvertently incurring international charges and prevents the fraudster from receiving a share of the revenue associated with such call-backs. And for customers who nevertheless fall victim to the scams, Verizon steps in when necessary to credit their account for inadvertently-incurred international charges.

II. ESTABLISHING A SAFE HARBOR FOR NETWORK BLOCKING BASED ON REASONABLE ANALYTICS WILL HELP PROTECT CONSUMERS FROM ONE-RING AND OTHER ROBOCALL SCAMS

The Commission should craft its safe harbor policy to allow Verizon and other voice service providers the flexibility needed to continue to evolve our fight against illegal one-ring scams (as well as others) without forcing a choice between consumer protection and litigation risk. The Commission should promote service provider programs that block calls reasonably identified as illegal, across-the-board. It should do so by issuing a safe harbor that applies to network-based blocking using reasonable analytics to identify illegal one-ring and other fraudulent calls. An appropriately broad safe harbor for carrier-initiated blocking would help service providers protect *all* of their customers, including ones who do not have access to customer-facing opt-in or opt-out blocking services.

III. A “C” ATTESTATION MANDATE WOULD HARM CONSUMERS, UNDERCUT AUTHENTICATION EFFORTS, AND DO NOTHING TO CURB INTERNATIONALLY ORIGINATED ONE-RING SCAM CALLS

A single commenter, T-Mobile, vaguely asserts that imposing an obligation on international gateway providers to append “C” attestations on all traffic entering the United States from foreign service providers could help combat one-ring scams.³ It claims that terminating providers could apply “more intensive scrutiny of calls handled by particular gateway providers and international callers.”⁴ But T-Mobile is wrong. It ignores the extensive record before the Commission establishing that numerous policy considerations militate against a “C” attestation mandate.

As Verizon explained in its reply comments on the Commission’s March 2020 Report and Order, requiring intermediate service providers to place “C” attestations on unsigned calls would degrade the usefulness of all attestations, including ones used judiciously pursuant to industry best practices that are under discussion; confuse and harm consumers, whose devices in many cases cannot tell the difference between a “validation” derived from a “C” attestation compared to an “A” or “B” attestation; add substantial complexity and costs to service providers’ STIR/SHAKEN implementations; and unnecessarily consume scarce bandwidth by placing useless attestations to billions of unsigned calls that in many cases will simply be ignored by terminating service providers.⁵

The great majority of commenters substantively engaging the “C” attestation issue confirm that the purported benefits of a “C” attestation mandate are illusory, and that the harms

³ See *Protecting Consumers from One-Ring Scams*, Comments of T-Mobile USA, Inc., CG Docket No. 20-93, at 6 (filed June 19, 2020).

⁴ *Id.*

⁵ See *In the Matter of Call Authentication Trust Anchor*, Reply Comments of Verizon, WC Docket Nos. 17-97, 20-67, at 8 (filed May 29, 2020).

are substantial. That includes various U.S.-based service providers,⁶ at least one foreign service provider,⁷ multiple trade associations,⁸ multiple other parties such as analytics providers⁹ and a leading standards-setting organization.¹⁰ T-Mobile does not even attempt any cost-benefit

⁶ *Id.* at 2 ("The proposal to require intermediate service to append "C" level attestations on all unsigned calls they receive would undercut the call authentication goal by polluting the ecosystem with billions of new "C" attestations that by definition will do nothing to authenticate traffic."). See also *In the Matter of Call Authentication Trust Anchor*, Reply Comments of AT&T, WC Docket Nos. 17-97, 20-67, at 2 (filed May 29, 2020); *In the Matter of Call Authentication Trust Anchor*, Reply Comments of CenturyLink, WC Docket Nos. 17-97, 20-67, at 6-7 (filed May 29, 2020) ("[B]ecause all unsigned calls – if they were required to be signed by an Intermediate Voice Service Provider – would be signed with a "C" attestation, there is concern that the call ecosystem would be flooded with "C" attestations of lesser value." This "would result in the commingling of 'millions of bad calls in with millions of good' with no real ability to distinguish between them.") (internal citation omitted).

⁷ See *In the Matter of Call Authentication Trust Anchor*, Comments of BT Americas Inc., WC Docket Nos. 17-97, 20-67, at 6 (filed May 15, 2020) ("However, requiring that all foreign-originated traffic receive only "C" attestations actually would be less valuable to US consumers and businesses as the mandate would mix all of these foreign originated traffic into a generic, 'less than trustworthy', C-attested or unattested pot of traffic.").

⁸ See *In the Matter of Call Authentication Trust Anchor*, Reply Comments of USTelecom – The Broadband Association, WC Docket Nos. 17-97, 20-67, at ii (filed May 29, 2020) ("While C-level attestations in certain contexts may have some usefulness in the future depending on how industry best practices develop, the Commission should not encourage them and certainly should not mandate their use."); *In the Matter of Call Authentication Trust Anchor*, Comments of CTIA, WC Docket Nos. 17-97, 20-67, at 10-11 (filed May 15, 2020) ("A 'C' attestation conveys that the provider has no relationship with the initiator of the call, but it records the entry point of the call into the provider's network. CTIA cautions against the Commission taking this further step to regulate intermediate providers' attestation practices.").

⁹ See e.g., *In the Matter of Call Authentication Trust Anchor*, Reply Comments of Hiya, WC Docket Nos. 17-97, 20-67, at 12-13 (filed May 29, 2020) ("Hiya supports the Commission's proposal to require intermediate providers to pass the Identity Header unaltered, but does not see the value in requiring intermediate providers to sign unsigned traffic with a "C" level attestation."); *In the Matter of Call Authentication Trust Anchor*, Reply Comments of Transaction Network Services, Inc., WC Docket Nos. 17-97, 20-67, at 7 (filed May 29, 2020) ("As Verizon has noted, placing 'C' level attestations on unsigned calls risks degrading the meaning of all attestations and confusing service providers and customers alike. Current industry practices do not imbue 'C' level calls with any information about the caller or the originating number. Until a 'C' level attestation can provide useful information about the call, it will have little to no value in call analytics.").

¹⁰ See *In the Matter of Call Authentication Trust Anchor*, Comments of The Alliance for Telecommunications Industry Solutions, WC Docket Nos. 17-97, 20-67, at 5 (filed May 15, 2020) (arguing against a "C" attestation mandate and explaining that one would "not directly facilitate identification of caller ID spoofing" but would impose "substantial unnecessary costs on service providers to establish new work streams to implement STIR/SHAKEN at gateway switches, diverting attention and resources away from important activities needed to sign and validate traffic in order to restore consumer trust and caller ID.").

analysis weighing the purported benefits of its proposal against the unrebutted harms that Verizon and others have identified.

Verizon appreciates the Commission's continued focus on these critical issues for reducing the impact of one-ring scams and illegal robocalls in general and looks forward to working with staff and other stakeholders in this proceeding as STIR/SHAKEN is implemented throughout the ecosystem.

Respectfully submitted,

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