



July 10, 2019

Commissioner Geoffrey Starks
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Tools to Combat Robocalls

Dear Commissioner Starks:

I appreciate the opportunity to respond on behalf of Vonage Holdings Corp. to your questions directed to our CEO, Alan Masarek, regarding our plans to offer default call blocking services. We share your concern about the harmful effects that unwanted calls are having on consumers, and we appreciate the Commission's attention to this important issue.

As I described in my January 2019 letter to Commissioner Rosenworcel, Vonage offers industry-leading tools for combating robocalls, and we are actively engaged in expanding our offerings. For example, we plan to implement the SHAKEN/STIR framework during 2019, and we are collaborating with the FCC, industry partners and vendors to ensure that our customers get the benefits of authenticated caller ID as soon as possible. In support of our collaboration, Vonage will sit on the voice carrier's panel at this week's SHAKEN/STIR Summit.

- 1. Indicate whether you will offer your customers default call blocking services on an informed opt-out basis and, if so, provide details of your plans to deploy these services, including a timeline for implementation.**

We intend to offer default call blocking services on an informed opt-out basis. These tools will likely include blocking based on information generated by the SHAKEN/STIR framework. While we expect to have completed our initial implementation of SHAKEN/STIR by the end of this year, industry stakeholders are still developing many of the policies and protocols that may influence blocking strategies. Other tools will likely be based on more traditional "black list" systems. We are actively engaging with vendors and other industry partners to make these blocking tools available as quickly as possible, and those discussions will influence our timeline for implementation.

- 2. Describe how you intend to inform consumers about this service.**

We intend to communicate blocking options to our customers through our website, our customer portal, e-mail, and/or communications from account managers. Vonage does not issue paper bills or inserts.

3. Indicate whether you expect to act contrary to the Commission's clear expectations and nevertheless charge your customers for these services.

At this time, we are still evaluating proposals for blocking tools, including the costs Vonage would be required to pay to vendors and any internal investments Vonage would need to make. However, our current expectation is that Vonage will absorb these costs for residential customers.

4. If you do not currently plan to offer customers default call blocking services on an informed opt-out basis, please explain why.

Vonage does plan to offer default call blocking services on an informed opt-out basis.

We share your concern about the growing problem of robocalls, and we appreciate the Commission's work to promote tools that combat scam calls, caller ID spoofing, and unwanted robocalls. I would be pleased to answer any additional questions you may have. Please do not hesitate to contact me at 732-444-4613.

Respectfully,



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CC: Alan Masarek, CEO of Vonage Holdings Corp.