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Sent Via Email

Honorable Geoffrey Starks
Commissioner
Federal Communications Commission
445 12th Street, SW Room TW-A325
Washington, DC 20554
Geoffrey.Starks@fcc.gov

Dear Commissioner Starks:

Pursuant to your letter of June 10, 2019, I am writing on behalf of Bandwidth Inc. (“Bandwidth”) regarding Bandwidth’s efforts to adopt systems, processes and procedures to help protect its customers and the broader communications industry ecosystem from the harms of illegal robocalling. Bandwidth operates a network that is entirely optimized for Internet Protocol (“IP”) technology and predominately acts in the capacity of an underlying service provider to other innovative IP-based communications service providers. As a result, Bandwidth is not typically positioned to offer consumer-oriented tools directly to end users itself, but is rather working to structure its underlying services in a manner that allow its customers the flexibility to deploy effective consumer-oriented solutions designed to avoid the receipt of illegal robocalls. Nevertheless, Bandwidth does have tools in the core of its network to block voice traffic that originates from invalid numbers as well as a SPAM messaging filter that benefit end-users and that are not charged for additionally.

Bandwidth is working to implement the most robust call authentication framework possible while also working diligently every day to stop the transmission of illegal robocalling on its network holistically. For example, Bandwidth has adopted a three-pronged operational approach (prevent, detect, and mitigate) to stopping illegal robocalls in keeping with the industry efforts and best practices. Bandwidth’s three-pronged operational procedures are summarized as follows:

- Prevention: Bandwidth has launched a series of customer communications aimed to clarify what constitute unlawful robocalls and instructs our customers to take all necessary steps to prevent these types of calls from originating from their networks. Bandwidth has implemented a stringent screening process designed to prevent potential robocalling companies from becoming Bandwidth customers.
- Detection: Bandwidth has implemented processes and procedures to detect and analyze campaigns on our network to determine if they are lawful or not. When unlawful robocall campaigns are detected, Bandwidth works to stop the unlawful activity as quickly as possible. Bandwidth is also in the midst of augmenting its robocall detection technologies which are expected to dramatically improve our ability to rapidly detect and react to suspected robocall behaviors.
- Mitigation: Bandwidth has also developed call blocking tools that prevent calls with specific unlawful telephone number characteristics from traversing the Bandwidth network. Bandwidth personnel regularly analyze network traffic for unlawful robocall campaigns and utilize our call blocking tools when appropriate. Bandwidth also initiates trouble tickets with customers that we've identified to be in the path of unlawful robocalls. Then we work diligently together with our customers to stop the unlawful robocall campaigns detected.

Bandwidth is an active participant and leader in industry organizations and industry efforts to stop illegal robocalling. Even prior to the establishment of the Robocall Strike Force,¹ Bandwidth was engaging the FCC and the FBI in efforts to stop consumer fraud in the form of Toll Free Traffic pumping, and participating in the USTA sponsored traceback efforts to identify robocall originators and support enforcement. Bandwidth works closely with the FCC, FTC, FBI and IRS among others in law enforcement and is actively engaged in working groups and at the board of director level at SIPForum, CTIA, Incompas, and SOMOS in their respective efforts to address the consumer threats of robocalling. Bandwidth is also a member of the NANC, served on the NANC's CATA Working Group and has been selected to be the Incompas representative on the ATIS STI-GA Board in charge of overseeing the procurement of vendors for the critical components of the SHAKEN/STIR framework such as the Certificate Authority and the Policy Administrator. Finally, Bandwidth is also a paid member and participant in the Communications Fraud Control Association (CFCA).

As it participates in these industry efforts, Bandwidth believes that consumers will benefit to the greatest degree when carriers and service providers can accurately identify illegal robocalls but without also improperly affecting valid traffic. Ensuring that illegal robocall prevention coexists with effective traffic delivery of legal calls across the

¹ See: FCC to Host First Meeting of Industry-Led Robocall Strike Force, Public Notice, DA 16-917 (rel.

communications ecosystem will depend critically upon the adoption of a set of additional supplemental standards and best practices to the current SHAKEN/STIR specifications. As an underlying IP-based provider of wholesale services to a wide array of innovative service provider customers large and small, Bandwidth is concerned that without a simultaneous adoption of standards that recognize and support myriad valid reseller models, end-users that rely upon IP-enabled services that incorporate underlying PSTN functions risk having their traffic improperly blocked or discriminated against. Therefore, the importance of establishing standardized approaches for accurate call identification delivery information to network operators and recipient end-users is paramount. The collective experience of Rural Call Completion² is a recent cautionary lesson to be carefully considered as the current movement to encourage carriers to block traffic grows. Recall that the significant call delivery problems that ultimately became known as Rural Call Completion originally emanated from default call blocking treatments that were implemented as measures to help prevent pervasive abuses occurring in rural calling areas.³

Thank you for your attention to the importance of protecting consumers in today's environment. Bandwidth looks forward to continuing its work to simultaneously advance the consumer benefits of competition and innovation in the communications marketplace while protecting consumers from the dangers of illegal robocalling. Should you have any additional questions or concerns, please do not hesitate to contact us.

Sincerely,

/s/ David Morken

David Morken

² See: 47 C.F.R. § 64 Subpart V. – Rural Call Completion

³ See generally: <https://www.fcc.gov/general/traffic-pumping>