

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Advanced Methods to Target and</b>	)	
<b>Eliminate Unlawful Robocalls</b>	)	<b>CG Docket No. 17-59</b>

**COMMENTS OF SPRINT CORPORATION**

Sprint Corporation (“Sprint”) submits Comments in response to the FCC’s Public Notice in CG Docket No. 17-59. Sprint applauds the Federal Communications Commission (“FCC” or “Commission”) and Chairman Pai for taking on these issues directly, and Sprint commits to continue to work with the Commission and the industry to reduce the intrusions into daily life caused by unwanted and often illegal robocalls, including efforts to build the SHAKEN/STIR call authentication system. While SHAKEN/STIR efforts are promising, they are by no means a panacea. The Commission should adopt a holistic approach to addressing unwanted robocalls and continue to evaluate what measures in addition to the proposed authentication system might be most effective.

**I. SHAKEN/STIR BY ITSELF WILL NOT SOLVE THE ROBOCALLING PROBLEM**

Sprint and other industry participants have worked diligently with standards organizations to create a system whereby domestic voice telephone calls transmitted in IP format can be authenticated from beginning to end. Call authentication using the SHAKEN/STIR toolset is one input among several that can signal to a terminating carrier or its customer that the incoming call is an illegal or unwanted robocall. Before mandating the use of SHAKEN/STIR—or even encouraging its widespread deployment—the Commission should evaluate how this tool

will fit in with the wider effort to combat unwanted robocalls.

SHAKEN/STIR cannot work as a solely or primarily U.S.-based standard. Sprint's experience is that a large percentage of illegal robocalls originate overseas. Whether a substantial number of other countries will adopt the SHAKEN/STIR framework is unknown. What is known is that the unwanted calls will seek out the weakest link in the system. Because most robocalls originate in IP format, they can quickly be aggregated and rerouted as soon as roadblocks are instituted.

The SHAKEN/STIR framework also leaves open the issue of what carriers should, or are permitted to, do with the authentication information. Should unsigned calls be automatically blocked? Should it be left to the choice of the end user? How will that be implemented in conjunction with other tools that carriers and third parties are currently using to combat robocalls? As Sprint has previously noted, the most practical solution to unwanted robocalling on wireless networks is the use of applications that receive call analytic information from various sources—including complaint databases, routing information, and authentication information—and allow customers to choose whether unwanted calls should be blocked, sent to voicemail, or ring through to the wireless device.

Unfortunately, the immediate effect of SHAKEN/STIR is likely to have minimal immediate effect. Small carriers are likely to lag large carriers in implementation. Any TDM link in the call flow will eliminate the ability to authenticate the call, and the nation is still many years away from all IP calling.<sup>1</sup> Robocallers will seek out the weakest link, and that may be

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<sup>1</sup> Full implementation of the FCC's intercarrier compensation reforms would expedite the transition to all-IP calling and thereby aid industry efforts to combat robocalling. Until the FCC completely eliminates the antiquated switched access regime LECs will continue clinging to TDM interconnection and traffic exchange.

small LECs with TDM networks looking to replace revenue from access stimulation as terminating call revenue has declined. And, as stated above, international traffic remains a great unknown. Until use of SHAKEN/STIR is ubiquitous, the fact that a call is signed or unsigned will have little predictive weight regarding the legality of a robocall. Most call recipients are unlikely to block all unsigned calls because it will be many years before the unsigned status of a call reflects that it is likely to be an unwanted robocall.

## **II. SHAKEN/STIR Is Only A Partial Solution**

The Robocalling Strike Force noted that SHAKEN/STIR is but one of many mitigation techniques that may be used to counter fraudulent calling. SHAKEN/STIR by itself does not actually prevent fraudulent calling; its output could be used to display some notification to the called party, but a standard has yet to be established for the interpretation of the output of SHAKEN/STIR to the called customer, and indeed it may not be possible to describe such interpretation in a technical standard that is meaningful to the consumer, other than a simple trust/doubt indicator. Otherwise the results from SHAKEN/STIR may be used for analysis, for example of calling patterns, but there are already other sources of verified data that may be used for this.

SHAKEN/STIR does not provide assured indication of all malfeasant activities, rather only those in which the bad actors may attempt to use SHAKEN/STIR compliant carriers on both the originating and terminating sides of the calls. The effect of this will therefore be to drive bad actors to use unreliable and overseas carriers for their fraudulent originations. In the medium term, the effect of SHAKEN/STIR implementation will be to drive the bad actors from the compliant carriers, who generally have not been hosting them in the first place.

Finally, it must be realized that the industry does not yet know the impact of the

implementation of SHAKEN/STIR on the cost of providing service. Of particular concern are the costs associated with the use of digital certificates. If SHAKEN/STIR implementation requires use of one certificate per telephone number, then the cost of certificate management may become prohibitive, or at least become very poor value in relation to the level of assurance provided. The Commission and standards organizations should be open to using more modern distributed certificate management processes that avoid potential economic and privacy pitfalls of centralized storage and control of sensitive information. Progress is being made in these areas and Sprint is eager to continue looking at all options to minimize the costs of certificate management.

### **III. User Choice Should Be Paramount in Battling Robocalls**

When acting in this area, the Commission must carefully weigh the costs and benefits of any regulatory requirements. Taking advantage of the capabilities of modern wireless devices is a more effective means of battling robocalls, both from a performance perspective and cost perspective, than mandating network based solutions. Fortunately, the Commission agrees and the proposed rules make such blocking voluntary and the use of SHAKEN/STIR voluntary while simultaneously paving the way for each carrier, device maker, mobile OS developer, app developer, or customer to manage their call flow in a way that makes sense to them.

Sprint is hopeful that call authentication will help carriers battle unwanted robocalls, but it is unlikely to be sufficient on its own to achieve the result desired by the Commission, carriers, and customers. Sprint is actively engaged in other ways to combat unwanted robocalls. Sprint has partnered with TNS/Cequent to enhance its Premium Caller ID product that allows Sprint customers to subscribe to an optional, paid service that empowers Sprint customers to receive information about the type of caller that is attempting to reach them and to set up preferences to

send those calls to voicemail or to block them entirely, category by category.

Sprint also recognizes that third-parties have created effective robocall prevention apps and encourages the Commission to adopt policies that allow for this marketplace to develop rather than imposing a one-size-fits-all requirement that would have the effect of stifling such innovation. Other companies have arisen to facilitate the exchange of information between legal callers and analytics companies and carriers to ensure that legal calls are not blocked and are properly labeled. Device manufacturers and OS developers should be encouraged to facilitate the development of software—by carriers as well as app developers—so that customers can choose their preferred solution.

#### **IV. Blocking**

Sprint has not implemented blocking of invalid, unallocated, or unassigned numbers despite the Commission's order permitting it to do so. Sprint's data does not show that robocalls from these numbers constitute a significant part of the problem. Blocking them would also increase spoofing as illegal call originators would shift their efforts to spoofing legitimate numbers. This spoofing causes harm to the owner of the spoofed number because its outgoing calls may be blocked or improperly identified as robocalls, and the owner may receive complaints from call recipients who falsely assume that the owner of the originating number was responsible for placing the illegal and unwanted calls.

#### **V. Industry Efforts Are Progressing**

Sprint is an active participant in informal industry working groups that are evaluating various proposals to eliminate illegal and unwanted robocalls and to ensure that legal, wanted calls are not erroneously blocked or inaccurately flagged. These efforts center around methods to ensure that traceback efforts are not undermined by nonresponsive or complicit carriers as efforts

are made to determine the source of illegal calls so that regulatory agencies and law enforcement can take appropriate action. Additionally, these efforts are examining ways to ensure that carriers are not facilitating illegal robocalls by their customers. Finally, industry is looking at methods and procedures that allow lawful callers to ensure that their calls are not wrongly targeted by blocking and flagging efforts. An alternative would be for call originators to work with carriers to display the incoming call to the customer with indicia of authenticity. The efforts to implement this stamp of approval are independent from SHAKEN/STIR.

## **VI. Traceback and Enforcement**

Traceback has not been effective at preventing robocalls. Not all carriers participate, and those that do not are most likely to be part of the problem. Sprint supports Commission efforts to increase industry involvement in traceback.

Government enforcement efforts center around stiff fines from the FTC and FCC. Many of the illegal robocalls are the first step in illegal fraud, and government should utilize its full criminal law enforcement powers to prosecute fraudsters who often are the instigators of mass illegal robocalling campaigns rather than issuing fines against insolvent and often overseas people and corporations.

## **VII. Framework for Evaluating the Effectiveness of Robocalling Mitigation Proposals**

The eventual aim of any work to mitigate robocalling and the use of spoofed caller IDs to perform miscreant acts must be to reduce the incentive to do this to such a point that the issue becomes insignificant, both as to its burden on carriers as well as the nuisance to individual customers.

To this end, a number of tools have been considered and created that can assist with such mitigation. In order to determine how each of these tools can be best applied, the full

characteristics of each need to be considered:

- What reduction in spoofing will this tool allow?
- How easy is it for the robocallers to continue to place unwanted calls while avoiding the traps placed by any particular tool?
- What is the cost to the consumer and legitimate network operators to deploy the tool?
- What are the other downsides of deployment of the tool, such as prevention of delivery of legitimate calls that are wanted by the recipient?

Sprint is concerned that many of the tools that have been generated have not been well tested against these criteria, or at least their proponents have not always been willing to proffer their role in the overall strategy required to minimize spoofed robocalling.

Overall, a more fruitful approach to the robocalling problem is to determine how much mitigation is required to reduce the spoofed robocalling problem to insignificant levels and to examine how all available tools can be assembled to enable such mitigation, rather than examining the merits of each individually and trying to determine how the Commission's rules should be adjusted to enable or even require the use of each on its own. The ability of the bad actors to avoid the impacts of each tool, whether it's blocking or authentication, both alone and in concert with others, must be weighed against the cost of implementation to the industry and ultimately to the consumer.

## **VIII. Conclusion**

Sprint fully supports the Commissions actions to address the plague of illegal robocalls. Neither carriers nor consumers benefit from the surge in illegal calls and Sprint will continue to work with the Commission and the industry to find solutions to this complex problem.

Respectfully submitted,

**SPRINT CORPORATION**



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