**Via ECFS**

Marlene H. Dortch,

Secretary Federal Communications Commission

445 12th Street, S.W.

Room TW-A325

Washington, DC 20554

**RE: Notice of Ex Parte Presentation, CG Docket No. 17-59, WC Docket No. 17-97**

On behalf of Everbridge, Inc. (“Everbridge”), the undersigned, Elliot Mark, Senior Vice President and General Counsel at Everbridge, submits this letter for consideration in connection with the draft Declaratory Ruling and Third Further Notice of Proposed Rulemaking (“draft Declaratory Ruling”) of the Federal Communications Commission (“FCC” or “Commission”) in the Advanced Methods to Target and Eliminate Unlawful Robocalls proceeding.

Everbridge has been in business since 2002 and was formed following 9/11 – inspired by the tragic events to build a system that would improve communication in a crisis and potentially save many lives. Everbridge began with a shared vision to help organizations communicate quickly, and reliably deliver the right message to the right people, on the right device, in the right location, at the right time during public safety threats and critical business events.

The expedited approval in the Declaratory Ruling referenced above, increases the likelihood that lifesaving communications will be blocked or delayed. Everbridge is used for critical communications and mass notification so that schools, businesses, governments, and other organizations can quickly and effectively communicate in a moment of crisis. The ability to deliver a clear message in a timely manner is crucial to the successful alerting, evacuation and preparedness of individuals. Especially so in:

1. Tornado Warnings
2. Hurricane Evacuations
3. Active Shooter Emergencies
4. HAZMAT Emergencies
5. Stroke, STEMI, and Trauma Alerts for Hospital Response Teams

The blocking or mislabeling of calls by a carrier’s call-blocking system based on characteristics of the call such as 1) a large number of calls in a short timeframe, 2) low average call duration or 3) low call-completion ratio has the potential to materially and adversely impact the safety of the public. Everbridge customers include the emergency management departments of a number of US states, major cities, counties, and metropolitan areas, dozens of airports and hospitals, and thousands of police departments. We are concerned that the proposed processes for blocking unwanted robocalls would have the unanticipated consequence of blocking or delaying communications from these organizations, and thereby could result in harm to the public and delay in first responders taking action to address a critical event.

We urge the FCC to carefully review and ensure “processes” for protecting companies from unscrupulous, inadvertent, or overly aggressive blocking, or if their specific technologies don’t adhere to the call authentication framework. We are requesting that the FCC reconsider making call blocking “too overly broad” and that the FCC allow for the implementation of safeguards to ensure that life safety messages are not blocked.

We would like to work with the FCC on a more programmatic approach to both managing Critical Calls Lists and to also develop additional authentication approaches that can ultimately address some of the gaps in SHAKEN/STIR. This includes advocating for the formation of a commission with the FCC on the development of a white list that is easy to programmatically access, edit and update, as well as an alternative to SHAKEN/STIR, that would allow the owner of the the original phone number to leverage it appropriately (enable a caller ID to be spoofed, for example) when lives are at stake.

In its current approach, SHAKEN/STIR does not allow that to happen.

Our summary recommendation is built on the following four points:

1. There are legitimate reasons for spoofing caller ID in emergency and operational situations.
2. The proposed mechanism, SHAKEN/STIR, is not going to allow for this legitimate spoofing of call lists
3. Critical Calls Lists is a partial solution, and we are willing to work, as an emergency alert provider, with the FCC to provide for a streamlined mechanism to programmatically updating a critical call list, but we don’t believe it is a viable long-term solution.
4. An alternative authentication mechanism that allows the owner of a call number to use that number in a variety of situations should be more aggressively developed.

We are eager to work with the FCC and others to do that.

Thank you for your consideration.

Respectfully submitted,

*/s/ Elliot J. Mark\_\_\_\_\_*

Elliot Mark, SVP and General Counsel

Everbridge, Inc.