

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

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	
)	
Call Authentication Trust Anchor)	WC Docket No. 17-97
)	

VERIZON REPLY ON FURTHER NOTICE

The record confirms that the Commission and industry have real opportunities to restore trust in voice calls. The Commission should continue to side with consumers, not with opponents of robocall blocking, by holding firm on its decision to permit default call blocking and by establishing a safe harbor for those rare instances where a blocking tool may erroneously block a wanted call. And it should establish an effective, comprehensive call authentication policy that not only ensures widespread deployment of the STIR/SHAKEN technology but that also requires any service providers who do not implement STIR/SHAKEN in the near term to implement appropriate, alternative practices to avoid serving illegal robocallers in the first place.

I. THE COMMISSION SHOULD NOT HAMSTRING SERVICE PROVIDERS' ABILITY TO PROTECT CONSUMERS WITH BLOCKING BASED ON REASONABLE ANALYTICS.

The Commission delivered a big win for consumers with its June 2019 declaratory order authorizing default call blocking; as a result, service providers have stepped up to more effectively protect their customers with blocking tools. Verizon is committed to protecting our customers from unwanted robocalls on all fronts, including by taking up the Commission's default call blocking green light. As service providers compete with one another to offer consumers the best blocking experience, they need flexibility to configure and deploy blocking

tools in the ways that most effectively meet consumers' demands. The Commission should reject calls to reduce service providers' flexibility because doing so could inhibit the market-driven development and deployment of increasingly robust and creative blocking and labeling tools.

Verizon agrees with the Commission and with those commenters who emphasize that blocking tools should care for legitimate callers and avoid blocking calls that consumers consent to and want to receive.¹ That is why Verizon's blocking and labeling tools are powered by sophisticated algorithms that are constantly updated so that they target only spam and fraud calls, and why we have established feedback mechanisms so that both customers and calling parties can bring to our attentions any inadvertent mistakes.² With Verizon and other blocking service providers committed to minimize any incorrect blocks, the Commission need not prescribe any rules that would limit blocking flexibility.

Consumers would also benefit from a safe harbor for service providers that engage in call blocking, as long as they reasonably use analytics for that blocking and as long as they incorporate into those reasonable analytics a call's STIR/SHAKEN status.³ Verizon agrees,

¹ See, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, CG Docket No. 17-59, WC Docket No. 17-97, at ¶¶ 38, 58 (rel. June 7, 2019) (“*Further Notice*”); see also, e.g., Comment of Professional Association for Customer Engagement, at 4-5 (July 24, 2019); Joint Letter of American Bankers Association, ACA International, American Association of Healthcare Administrative Management, American Financial Services Association, Consumer Bankers Association, Credit Union National Association, Edison Electric Institute, Independent Community Bankers of America, Mortgage Bankers Association, National Association of Federally-Insured Credit Unions, and National Retail Federation, CG Docket No. 17-59, at 5-6 (June 24, 2019) (“*Joint Trades Letter*”).

² See, e.g., <https://www.voicespamfeedback.com> & <https://www.spamalerts.verizon.com>. Verizon also invites customers to provide feedback directly via their smartphones. And it educates calling parties about “best practices” so they have information about how to avoid becoming caught up in Verizon’s or other parties’ blocking or labeling tools. See, e.g., <https://www.voicespamfeedback.com/vsf/bestPractices>.

³ Verizon Comments on Further Notice, CG Docket No. 17-57, at 11-12 (July 24, 2019).

however, with commenters seeking confirmation that – at least prior to STIR/SHAKEN’s widespread deployment – service providers will not block a call based solely on the fact that it arrives without a STIR/SHAKEN signature.⁴ For now, the analytics engines that power blocking service providers’ blocking tools should rely on additional factors, such as if the calling party number is identified as spam or if network analytics identify the call as coming from an untrusted source, to determine whether an unsigned call should be blocked.

II. THE COMMISSION SHOULD ESTABLISH AN EFFECTIVE STIR/SHAKEN REGIME AND IMPOSE OBLIGATIONS ON SERVICE PROVIDERS TO AVOID ORIGINATING ILLEGAL ROBOCALLS.

A. Restoring Trust in Caller ID Requires Widespread STIR/SHAKEN Implementation.

Full implementation of STIR/SHAKEN offers significant promise for turning the tables on illegal robocallers. But verifying Caller ID for consumers using STIR/SHAKEN presents a classic collectivity challenge that industry may not be able to overcome on its own. A provider can effectively use STIR/SHAKEN to verify an incoming call for its customer only if the provider originating the call has also implemented STIR/SHAKEN. Consumers will thus continue to be harmed if some voice providers do not implement the STIR/SHAKEN call authentication technology.⁵ The Commission should therefore stand ready to step in and ensure that providers promptly start embracing STIR/SHAKEN.

Targeting only large service providers to implement STIRSHAKEN will not solve the robocall problem because other providers would continue to serve illegal robocallers who avoid

⁴ See, e.g., Joint Trades Letter at 3.

⁵ See, e.g., Comments of NCTA – The Internet & Television Association, CG Docket No. 17-59, at 6 (July 24, 2019); Verizon Comments on Further Notice at 2-4.

detection by spoofing unauthorized numbers.⁶ So, the Commission should ensure that the entire voice communications industry—including foreign Voice over Internet Protocol (VoIP) providers—implement STIR/SHAKEN, and/or certify (as discussed below) that they have programs in place to avoid originating illegal traffic in the first place.

B. The Commission Should Require Providers Who Do Not Implement STIR/SHAKEN to Certify That They Do Not Originate Illegal Robocalls, and Should Track Certifications in a Publicly Available Registry.

The record indicates that even with a mandate, in the short and medium term there will remain pockets of traffic that is not STIR/SHAKEN-enabled.⁷ So, the Commission also should take steps to ensure that bad actors cannot exploit those pockets of unsigned traffic to spam consumers with illegal robocalls. One step should be to require providers originating calls not signed with STIR/SHAKEN to certify that they have implemented alternative robocall mitigation programs to avoid originating illegal robocalls. As Verizon explained in its initial comments, the Commission should craft non-prescriptive rules permitting each service provider to avoid originating illegal robocalls in ways that make sense based on its customer base and the type of service it provides.⁸ But it should scrutinize a service provider's robocall mitigation practices if that provider is found to consistently originate illegal robocalls despite being informed that such calls originate on its network.⁹

⁶ *Id.*

⁷ Numerous commenters have described challenges with implementing STIR/SHAKEN because the standard is not designed for legacy Time Division Multiplexing (TDM) technology. *See, e.g.*, Comments of NTCA – The Rural Broadband Association at 2-9; Comments of Competitive Carriers Association at 4-7. And for certain complex enterprise and call center use cases, the industry standards bodies are still working through techniques for service providers to follow to properly attest to the authenticity of the calling party number. *See, e.g.*, Verizon Comments on Further Notice at 8-11.

⁸ *Id.* at 4-6.

⁹ *Id.*

The Commission’s comprehensive robocall framework also should include a registration requirement for all service providers that handle any traffic destined for U.S. consumers.¹⁰ That will help create transparency about which service providers handle traffic destined for U.S. consumers and ensure that all providers (i) implement STIR/SHAKEN and/or (ii) certify that they have implemented appropriate robocall mitigation procedures. As Verizon explained in its initial comments, such a registration regime could leverage existing registries and be implemented prior to STIR/SHAKEN’s ubiquitous deployment so that downstream carriers can start using it to ensure that every service provider in the call path steps into appropriate robocall mitigation obligations.¹¹

C. The Commission Should Prohibit Improper or Sloppy Signing of Calls With STIR/SHAKEN.

The Commission should define what it means for a provider to “implement” STIR/SHAKEN because the STIR/SHAKEN tool, if improperly used by some service providers, could degrade its usefulness for other providers and potentially harm consumers. For example, if a service provider signs a call with STIR/SHAKEN without knowing that the calling party number transmitted with the call is in fact correct, the signature will not validate the Caller ID of the incoming call. Indeed, if consumers receive incorrectly “verified” calls because originating providers sign improperly-spoofed calls, consumers will lose trust in the authentication regime.

¹⁰ *Id.* at 7-8; *c.f.*, Comments of West Telecom Services, LLC, CG Docket No. 17-59, at 20-23 (July 24, 2019) (proposing a safe harbor from a STIR/SHAKEN mandate that would be monitored with a registration and certification system).

¹¹ Verizon Comments on Further Notice at 7-8.

Industry standards organizations are developing ways to ensure that calls are signed with meaningful attestations based on techniques for originating providers to confirm the caller is authorized to use a particular number (i.e., “A” level attestations).¹² But some service providers may choose to either sign calls with “A” attestations without undertaking the work needed to verify the accuracy of the calling party numbers, or to simply default to lower-level attestations (“B” or “C”) that are insufficient for the downstream carrier to validate the incoming calls on behalf of called consumers. These attestation practices could undercut restoring consumer trust in Caller ID. The Commission should thus pursue policies that drive service providers to meaningfully and accurately attest when signing calls.

CONCLUSION

As discussed above and in Verizon’s initial comments, the Commission should incent robust call blocking and ensure that STIR/SHAKEN is deployed in ways that maximize its usefulness and help service providers protect consumers by taking the fight to illegal robocallers.

¹² *Id.* at 8-11.

Respectfully submitted,

William H. Johnson
Of Counsel

Gregory M. Romano
Christopher D. Oatway
1300 I Street, N.W.
Suite 400 West
Washington, DC 20005
(202) 515-2400

*Attorneys for Verizon
and Verizon Wireless*

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