

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

In the Matter of

*Advanced Methods to Target and Eliminate
Unlawful Robocalls*

CG Docket No. 17-59

COMMENTS OF NEUSTAR, INC.

Neustar, Inc. (“Neustar”) hereby submits the following comments in response to the Federal Communication Commission’s (“FCC” or “Commission”) *Second Notice of Inquiry* regarding robocalls made to phone numbers of consumers who consented to receive calls but whose phone numbers subsequently have been reassigned.¹

Neustar supports the Commission’s commitment to tackling the multifaceted problems associated with unwanted autodialed and pre-recorded calls to reassigned phone numbers. These problems include foisting unwitting liability on companies engaged in lawful calling, annoying customers who receive unintended calls to their new phone number, causing customers from whom a phone number has been reassigned to miss important information, and creating inefficiency in how businesses communicate relevant and legitimate information to consumers.

However, Neustar does not believe that the creation of a new database of reassigned phone numbers is the solution. Rather, in Neustar’s view, the problems with which the Commission is grappling are best addressed by robust, technologically sophisticated, and competitive commercial offerings that reduce the likelihood of placing calls to reassigned phone

¹ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Second Notice of Inquiry, FCC 17-90 (“*Second Notice of Inquiry*”).

numbers. Such offerings allow callers to mitigate the risk of calling reassigned numbers while also protecting consumers from unwanted calls. Neustar currently makes such a service available to many of the largest brands in the United States.²

Neustar’s commercial solution utilizes a multi-faceted approach that starts at an early stage in the phone number assignment process and is based upon insights from existing industry data and expertise. It utilizes authoritative intelligence around the linkages of a phone number to a consumer as well as attributes about that phone number to drive operational efficiencies, rather than simply relying upon “information about number reassignments.”³ In addition to providing information about disconnected phone numbers, Neustar’s solution: (1) tracks the movement of telephone numbers from wireline to wireless devices, a key distinction for TCPA compliance purposes;⁴ (2) identifies numbers of Voice over Internet Protocol (“VoIP”) providers, which present TCPA risks, including the movement of telephone numbers to VoIP providers; (3) provides name-to-phone verification, which serves as an additional check of whether a given phone number still belongs to the subscriber who gave his or her consent to be contacted at that phone number; and (4) provides other unique insights to help companies make better dialing decisions. Neustar also can proactively notify outbound dialers when disconnects or other changes in linkages or insights occur, which allows relevant information to be disseminated more quickly without a caller having to initiate a database query or wait to scrub its call list at a later date, possibly calling reassigned numbers in the meantime. These insights, analytics, and

² See *id.*, ¶ 6 (identifying Neustar as one entity providing “tools” to “help callers identify reassignments”); see also <https://www.neustar.biz/risk/compliance-solutions/tcpa>.

³ *Second Notice of Inquiry*, ¶ 9.

⁴ Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227(a), (b); see also 47 C.F.R. § 64.1200(a)(3).

processes provide the means for a business to respect consumer privacy when phone numbers are reassigned while preserving its ability to contact consumers for legitimate business purposes.

Neustar’s solution is considerably more robust than any database of reassigned numbers that realistically could be created and maintained, whether by the Commission or any third party.⁵ Thus, Neustar does not believe that any need exists for the Commission to create a new database “to accommodate reassigned number information.”⁶ In addition to not accomplishing the FCC’s goals, there is no 100 percent solution or “silver bullet” available when dealing with disparate and complex datasets.⁷ Furthermore, the creation of a single database of reassigned numbers would be a costly and complicated exercise that would provide less useful information to callers as compared to the information available from Neustar today.

Instead of creating a reassigned numbers database and attempting to resolve the myriad of related implementation issues, the Commission should take advantage of existing commercial service offerings. The solutions in market can help address the challenges associated with robocalls made to phone numbers of consumers who initially consented to receive calls but whose phone numbers have been reassigned. Specifically, the Commission should facilitate the development of best practices for businesses to follow in verifying who they are calling that utilize commercial solutions meeting specified criteria. For example, the Commission could issue a best practices guide for businesses. This best practices approach could be implemented

⁵ *Second Notice of Inquiry*, ¶¶ 16-19.

⁶ *Id.*, ¶ 27.

⁷ For example, while the Commission may aspire for “guaranteed methods to discover all reassignments immediately after they occur,” *id.* ¶ 6, a database would not achieve this goal. Datasets are never perfect, and there are inherent time lags associated with populating real-time information in any given database.

more quickly and at less cost than any database solution and is considerably more likely to bring about tangible benefits to both consumers and businesses.

August 28, 2017

Respectfully submitted,

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