

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

**COMMENTS
OF
WTA – ADVOCATES FOR RURAL BROADBAND**

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Summary

WTA – Advocates for Rural Broadband (“WTA”) believes that the key to the resolution of many of the robocall blocking issues raised in this proceeding is the development and implementation as soon as possible of an efficient, effective and economic alternative caller ID authentication framework for calls originating on the forty percent (40%) or more of the voice service network where STIR/SHAKEN does not work due to the lack of a call path that is entirely IP from end-to-end. WTA is not proposing a specific alternative at this time, although some of its members believe that the alternative Out-of-Band SHAKEN technology may -- by itself or in conjunction with additional analytics and/or call placement services -- be able to authenticate and verify caller ID for originating calls lacking an all-IP call path in a manner that looks virtually the same to downstream voice service providers as STIR/SHAKEN caller ID authentication.

In addition to urging acceleration of the completion, approval and deployment of a cost-effective complement to STIR/SHAKEN, WTA: (a) opposes the blocking of alleged robocalls solely on the basis of caller ID authentication, at least until a STIR/SHAKEN alternative for non-all-IP call paths is in place; (b) opposes the blocking of alleged robocalls by intermediate voice service providers that have no relationship to the called parties who have the right to opt out of the blocking process; (c) supports a calling party verification process that begins with contacting the terminating voice service provider that is blocking calls; (d) requests further clarification of the “effective robocall mitigation programs” contemplated by the Commission and seeks clear legal authority (such as warrants, subpoenas and safe harbors) to protect cooperating and participating service providers from legal liability for their blocking efforts; (e) suggests that the Commission develop a rapid response team to deal with fraudulent robocallers that cannot effectively be identified and deterred by formal processes; (f) requests that the Traceback Consortium be

delegated specific powers as a Commission agent and that traceback requirements be limited to reasonable best efforts rather than being open-ended and subject to excessive effort and expense; (g) requests specific Commission-prescribed steps for dealing with bad traffic from both existing and new customers; (h) opposes network-based robocall blocking that would eliminate the right and ability of customers to opt out of the blocking of robocalls calls to them; (i) requests that notification and dispute resolution periods established for redress procedures take into consideration the small staffs of Rural LECs and other small voice service providers, and at least specify longer periods for small providers; and (j) opposes requirements for the periodic provision of free blocked call lists to requesting customers.

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WTA – Advocates for Rural Broadband (“WTA”)¹ submits its comments with respect to the rulemaking portion of the Commission’s *Third Report and Order, Order on Reconsideration, and Fourth Further Notice of Proposed Rulemaking*, FCC 20-96, released July 17, 2020, in the captioned proceeding (“*Order & FNPRM*”). These comments are submitted in accordance with the schedule established in 85 Fed. Reg. 46063 (July 31, 2020).

WTA supports the Commission’s efforts to prevent unwanted and illegal robocalls to consumers and to implement the Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (“TRACED Act”). WTA and its Rural LEC members wish to cooperate with the Commission, Congress and other voice service providers to implement effective, efficient and economic measures to discourage, reduce and ultimately eliminate spam-related and other unwanted robocalls and related caller ID spoofing.

¹WTA is a national trade association representing more than 350 rural telecommunications providers that offer voice, broadband, and video-related services in rural America. WTA members are predominately rural local exchange carriers (“Rural LECs”) that serve some of the most rugged, remote and/or sparsely populated areas of the United States.

However, as WTA has indicated throughout this proceeding, the STIR/SHAKEN² caller ID authentication framework that presently forms the core of the Commission's anti-robocall efforts is not technically viable or economically feasible for many WTA members and other small voice service providers. Whereas some WTA members have converted their voice services from time-division multiplexing ("TDM") to Voice over IP ("VoIP") and others would like to do so, most cannot rely upon the STIR/SHAKEN framework whether or not they convert to VoIP because their voice traffic cannot be routed end-to-end entirely via IP facilities. Rather, a large portion of Rural LEC voice traffic (whether it originates as VoIP or TDM traffic) must pass through TDM tandems and/or other TDM-based interconnection and middle mile facilities maintained by unrelated carriers that have shown no inclination to replace such facilities with IP technology during the foreseeable future.

This STIR/SHAKEN adoption and implementation problem has been noted on the Alliance for Telecommunications Industry Solutions ("ATIS") website, where it was recently estimated that approximately 40 percent of the nation's voice circuits remain non-IP based. ATIS leaders have further recognized that conversion by remote rural voice service providers from TDM to VoIP technology may not be sufficient to enable them to participate in STIR/SHAKEN call authentication. Rather, because STIR/SHAKEN requires that calls be IP all the way from the originating end to the terminating end, it cannot be used reliably if any portion of the call path (which may extend close to or over 100 miles for some WTA members and involve several unrelated intermediate carriers) is non-IP.³

²STIR/SHAKEN is comprised of the Secure Telephone Identity Revisited ("STIR") and Signature-based Handling of Asserted information using toKENs ("SHAKEN") standards that have been combined to develop a caller ID authentication technology for voice service providers that use Internet Protocol ("IP") networks.

³ Philip Linse, "The Other 40% of the Network: ATIS Addresses TDM Network Call Authentication," ATIS Insights Blog (August 15, 2020).

WTA is aware that ATIS is investigating and trying to develop alternatives to STIR/SHAKEN for voice service providers that do not have access to call paths that are wholly IP end-to-end. However, until an alternative call authentication framework is recognized by the Commission and required to be accepted throughout the voice service industry, WTA is concerned that reverse call completion problems will arise if legitimate voice calls originating on Rural LEC networks are blocked because they cannot be authenticated by the STIR/SHAKEN framework.

The foregoing concerns form the basis for WTA's following comments in response to the *Fourth Further Notice of Proposed Rulemaking*. WTA also notes that there are significant Rural LEC concerns about the costs of the equipment and labor necessary to implement robocall blocking, and the manner in which such costs can be recovered. As the Commission is well aware, the primary task of Rural LECs and many other service providers is to extend and upgrade their broadband networks and services. This is a very difficult and expensive mission under normal circumstances, and has become even more challenging this year due to the COVID pandemic and its accompanying needs to provide new or increased service to quarantined customers working and studying from home and to continue service to many customers who cannot pay their bills due to lost jobs and income. Whereas deterring robocalls is a worthy goal, it nonetheless entails one more regulatory and reporting obligation – in addition to cybersecurity, local number portability, performance testing, mapping, HUBB reporting, access charge changes, broadband transparency, to name some – that use dollars and other resources that are urgently needed by Rural LECs and others for broadband deployment. The Commission is reminded that a camel can bear a load of straws, but that eventually the addition of one more straw will break its back.

I
Section 4 of the TRACED Act

If the STIR/SHAKEN framework cannot accurately and reliably authenticate caller ID for calls originating from at least 40 percent of the nation's current voice lines – either because the voice lines are TDM lines or because a portion of the call path is not IP – it is hard to see how a robocall blocking effort based in whole or substantial part on information provided by STIR/SHAKEN caller ID authentication can be effective. It would appear that the immediate pressing need is for an alternative and complementary technology and/or framework that can accurately, reliably and economically authenticate caller ID for calls originating on the 40 percent or more of the voice service network where STIR/SHAKEN does not work.

It is WTA's understanding that some of its members and ATIS have been working, *inter alia*, with alternative Out-of-Band SHAKEN technology that may -- by itself or in conjunction with additional analytics and/or call placement services -- be able to authenticate and verify caller ID for originating calls lacking an all-IP call path in a manner that looks virtually the same to downstream voice service providers as STIR/SHAKEN caller ID authentication. WTA is aware that ATIS is investigating multiple alternatives to STIR/SHAKEN, and WTA is not recommending any particular technology alternative at this time. Rather, the critical point is that an effective robocall blocking program based primarily upon caller ID authentication needs reliable authentication on 95-to-100 percent of voice lines rather than something around 60 percent or less. Therefore, the pressing priority appears to be the need to develop, approve and implement an alternative caller ID authentication framework to plug the gaping hole comprised of the 40 percent or more voice lines where STIR/SHAKEN does not work.

A. Blocking Where STIR/SHAKEN Authentication Is Unavailable

In paragraph 86 of the *Order & FNPRM*, the Commission notes that it does not permit blocking solely on caller ID authentication information and asks whether it should take any other steps to ensure that voice service providers that are subject to a delay in compliance consistent with the TRACED Act are not unreasonably blocked because they are not able to be authenticated.

WTA believes that the development, adoption and implementation of an alternative caller ID authentication technology as soon as possible is the only way to fully and effectively solve this problem. In the interim, the Commission needs to emphasize that terminating voice service providers may NOT block calls solely on the basis of the absence of STIR/SHAKEN authentication due to the many legitimate calls and lines where STIR/SHAKEN is unavailable, and that any such blocking will not be protected by the available safe harbors. The Commission should make it clear that, with respect to the many calls that do not have wholly IP call paths from end-to-end, reasonable analytics such as white lists and black lists will have to be used to try to distinguish legitimate calls from unlawful robocalls until an appropriate complement to STIR/SHAKEN can be implemented. And to the extent that such analytics are not wholly accurate in identifying and blocking unlawful robocalls, the terminating service providers using them should not be penalized if some robocalls elude their reasonable efforts to identify and block them.

B. Blocking Based Solely on Caller ID Authentication

In paragraphs 83 and 84 of the *Order & FNPRM*, the Commission asks whether it should permit robocall blocking based solely upon caller ID authentication information (or using such information in a manner other than incorporating it into reasonable analytics), and whether the existing safe harbors should be extended to cover such situations.

WTA opposes blocking based solely upon caller ID authentication information, particularly when at least 40 percent of the nation's voice lines cannot have their calls authenticated by STIR/SHAKEN. The prudent approach is to develop and implement an alternative caller ID authentication framework for call paths that are not wholly IP end-to-end and to see how effective STIR/SHAKEN and the alternative framework are in working with reasonable analytics to accurately and efficiently block most or all unlawful robocalls. If that approach does not prove effective in blocking certain types of robocalls, the Commission can then explore and develop targeted approaches to address loopholes and continuing offenders and revise its requirements and safe harbors accordingly. However, at this time, the critical need is to get all or virtually all voice lines covered by functional and reliable caller ID authentication frameworks and to determine how effectively such frameworks operate in conjunction with reasonable analytics to accurately identify and block most or all unlawful robocalls.

C. Blocking by Intermediate Service Providers

In paragraph 83 of the *Order & FNPRM*, the Commission asks whether there are any instances where it should permit voice service providers other than terminating voice service providers to block based upon caller ID authentication information.

WTA is not aware of any situations where interexchange carriers or other intermediate service providers (that are not likely to have direct or billing relationships with the called parties) would be in a position to more accurately and effectively block alleged robocalls based upon caller ID authentication information. Rather, because a critical element of the Commission's "Safe Harbor Based on Reasonable Analytics" is that consumers must be given an opportunity to opt out of robocall blocking, such blocking should be limited to terminating service providers. Every called party has a direct carrier-customer relationship with the terminating voice service provider

from which the party receives service. Hence such terminating providers are the entities in the best position -- and often the only entities able -- to ascertain and implement customer preferences and instructions regarding participation in robocall blocking.

D. Calling Party Process

In paragraph 85 of the *Order & FNPRM*, the Commission seeks comment on establishing a process for calling parties adversely affected by caller ID authentication information to verify the authenticity of their calls.

WTA believes that such a process needs to start with the terminating voice service provider(s) that are blocking the calling party's calls. Only the terminating voice provider(s) will know why the entity's calls are being blocked and the extent and reasons why any caller ID authentication information is wholly or partially responsible for such blocking. The originating voice service provider, which will generally have a carrier-customer relationship with the calling party, may need to be queried to furnish relevant information, but the investigation of the reasons for blocking will generally start with and significantly involve the terminating voice service provider as the entity that is actually doing the blocking.

II Section 7 of TRACED Act

In paragraphs 89 and 90 of the *Order & FNPRM*, the Commission asks how it can protect subscribers and their privacy from unwanted calls from unauthenticated numbers while not disadvantaging callers whose voice service providers are unable to participate in caller ID authentication or whose calls transit non-IP networks.

WTA repeats that the best solution is for the Commission to make a top priority the development and implementation of an efficient, effective and economical alternative caller ID authentication framework for call paths that are not wholly IP end-to-end. "Full deployment" of

STIR/SHAKEN is not the answer as long as it does not work on call paths that are not entirely IP. Some WTA members believe that Out-of-Band STIR/SHAKEN is a workable solution, but WTA is willing to wait for more information from ATIS.

WTA is not clear what the Commission specifically means by “effective robocall mitigation programs.” As WTA has repeatedly advised the Commission, its members are predominately locally owned and/or managed and know their customers very well. If a robocalling entity were to set up operations in its service area, a Rural LEC would be likely to surmise or reasonably suspect that its lines were being used for robocalling purposes. However, the Rural LECs legal obligations as a telecommunications carrier to respect the form and content of calls, as well as its responsibilities under the Commission’s customer proprietary network information (“CPNI”) rules, limit the extent to which it can investigate the nature and content of calls to and from customers on its own authority. The Commission could establish and distribute a blacklist of known or suspected robocallers, but it would need to develop a warrant, subpoena or safe harbor process that would authorize Rural LECs and other telecommunications carriers to provide call destination and call content information to justify or substantiate the presence of their customers on such blacklists and to protect such carriers from lawsuits and liability for doing so.

WTA believes that a large number of robocalls are annoying advertisements that go unanswered or are terminated by quick hang-ups without any significant or lasting adverse impacts upon customer privacy. The more disturbing and harmful robocalls are those that entail scams such as seeking to steal identity or financial information by pretending to be from banks, credit card companies and federal agencies (such as the Internal Revenue Service or Social Security Administration), or fraudulently seeking “contributions” for organizations and victims recently in the news. These criminal robocallers are difficult to identify and track down and even more

difficult to adopt general rules to combat, for many are very good at finding new weaknesses and loopholes to exploit as well as changing their identities, tactics and targets to reduce the likelihood of detection and punishment. To deal with fraudulent robocallers, the Commission needs a rapid response team to discover their scams as early as possible, to alert the targeted segments of the public, and to provide law enforcement with evidence necessary to deter wrongdoers by arrests, imprisonment and confiscation of their potential “gains.”

III Requiring Voice Service Providers to Meet Certain Standards

In paragraphs 95 through 103 of the *Order & FNPRM*, the Commission requests comments on requirements for voice service providers to respond to traceback requests, mitigate bad traffic, and prevent illegal calls from new and renewing customers.

A. Response to Traceback Requests

Telecommunications carriers have long been required to provide certain call records to law enforcement in response to appropriate warrants and subpoenas. WTA has no objection to requirements for voice service providers to respond to appropriate and lawful traceback requests from the Commission and law enforcement. It also has no objection to such traceback requests from the Traceback Consortium so long as it is specifically established that the Traceback Consortium is a duly authorized and designated agent of the Commission and that voice service providers are required by law to respond to Traceback Consortium requests and entitled to the same protections when doing so as if such requests had come from the Commission or law enforcement.

WTA notes however that the requirement to respond to traceback requests needs to be limited to technically and economically reasonable and good faith efforts with installed facilities and equipment. The concern here is that certain robocallers may seek to defy and evade the

Commission's anti-robocall efforts by adopting technologies and tactics that make it extremely difficult or expensive to trace back their calls. The Commission can address specific circumstances if and when they arise but at this time should make it clear that the traceback requirements that it is adopting are of the reasonable best efforts variety rather than being open-ended so as to require carriers to expend inordinate amounts of time and money to try to complete certain tracebacks.

B. Mitigating Bad Traffic and Preventing Illegal Calls from New Customers

WTA does not oppose the Commission's proposals: (a) to require all voice service providers to take effective steps to mitigate bad traffic when notified of that traffic by the Commission; and (b) to require voice service providers to take affirmative, effective measures to prevent new and renewing customers from using their networks to originate illegal calls. However, in each case, WTA believes that the Commission should require voice service providers to take specific, Commission-prescribed steps to enforce these requirements rather than leaving them to develop their own plans and measures.

As telecommunications carriers, Rural LECs and other voice service providers are required to provide service to customers that accept their rates, terms and conditions and generally have little or no control over or responsibility for monitoring the form and content of the messages that customers choose to transmit over their facilities. Whereas some states are adopting alternative regulatory systems and reducing or eliminating tariff requirements, many of these pricing, terms, conditions and carrier-customer relationships are still governed by state law and state-approved tariffs. If the Commission requires voice service providers to develop and implement their own measures, the result is likely to be delays and uneven and ineffective enforcement as individual providers are forced to deal with unfamiliar issues and entities, state laws and commissions, tariff and service contract provisions, and threats of lawsuits. It will be much more efficient and

effective for the Commission to use its experience with robocallers and their tactics, as well as with other federal and state agencies and legal requirements, to specify the steps that voice service providers must take to deal with bad traffic from both existing and new customers and to take the lead and bear the burden of defending such measures if and when they are challenged by alleged robocallers.

IV Extending Reasonable Analytics Safe Harbor to Network-Based Blocking

WTA opposes the proposal in paragraphs 104 to 106 of the *Order and FNPRM* to extend the reasonable analytics safe harbor to cover network-based blocking. This is an unwarranted and potentially dangerous departure from the established safeguard of giving customers the right and opportunity to opt out of the blocking of suspected robocalls directed to them. Call blocking *per se* is a restriction upon the right of the called party to associate with those whom he or she wishes, and to listen and/or respond to the commercial and non-commercial messages of those calling his or her telephone. In the case of annoying or fraudulent robocalls, it is reasonable and legitimate for the Congress and Commission to establish call blocking rules and procedures as long as individual customers retain the right to opt out of the blocking of their calls. In the absence of such opt-out rights, call blocking is potentially subject to abuse as governments and/or service providers can over time acquire the ability to determine what is or is not an “unlawful robocall” and to block or not block certain types of alleged “robocalls” for political or commercial purposes. Particularly at a time when there is significant controversy over alleged censorship of disfavored information by social media companies, the Commission should tread very lightly in this area and retain the right of customers to determine whether or not “robocalls” to them should be blocked.

V Expansion of Redress Rights

WTA does not dispute the need for redress procedures that permit alleged robocallers to learn that their calls are being blocked and to dispute such blocking if they believe that their calls are lawful. However, the proposed notification and dispute resolution periods in paragraphs 107 and 108 of the *Order & FNPRM* appear to be designed with large carriers in mind and to be unreasonably short and burdensome for Rural LECs and other small voice service providers.

As WTA has frequently advised the Commission, its members and other Rural LECs have relatively small staffs, with some comprised of as few as 5-to-10 full-time employees (many of whom are inside and outside plant maintenance and installation technicians). Even without vacations, sick leave and family emergencies, many Rural LECs do not have sufficient staff to investigate and determine the source of blocked robocalls within 24 hours or to investigate and respond to disputes about erroneous call blocking within 24 hours or a week. Given that many robocalls are spoofed and that robocallers may not want to be readily located by law enforcement, it may take a Rural LEC employee several days or weeks (if he or she can do so at all) to identify a robocaller and even longer (if at all) to obtain an accurate current physical or email address to send it a notification. And this assumes that the Rural LEC has to deal with only one alleged robocaller at a time. It is quite possible that some Rural LEC staffs will be forced to deal with multiple robocall investigations, notifications and dispute resolutions at the same time – in addition to their normal service, maintenance and administrative duties. Under such circumstances, the 24-hour and one-week deadlines mentioned would not only be impossible to meet but also would disrupt and impair the normal operations depended upon by their voice and broadband customers.

If the Commission determines to adopt notification and dispute resolution deadlines herein, WTA proposes that it recognize the limited resources of Rural LECs and similar small voice

service providers and set more realistic and achievable deadlines for them -- for example, at least 20 days for notifications to alleged robocallers whose traffic they have blocked (with exemptions or extended times for entities whose identities and addresses cannot readily be ascertained) and at least 30-to-45 days for resolution of disputes.

VI Blocked Call Lists

In paragraph 111 of the *Order & FNPRM*, the Commission proposes to require terminating voice service providers to provide a list of individually blocked calls that were placed to a particular number at the request of the subscriber to that number and at no additional charge to such customer. WTA believes that this currently vague proposal can become extremely expensive and burdensome and that its likely costs will far outweigh any potential benefits.

First, WTA is aware of no perceptible demand on the part of customers for any sort of blocked call list. Most robocalls are either unanswered, terminated quickly when the answering customer realizes that the call is a robocall, or erased rapidly from voicemail devices. If surveys were conducted of voice service customers, WTA believes that only a very small percentage would want to see monthly, semi-annual or annual lists of the robocalls directed to their telephone number that were blocked.

Second, if service providers were allowed to impose a charge for a periodic blocked call list – even a relatively nominal charge that would not cover the cost of preparing the list – customer demand for such lists would be likely to decrease even further. Whereas some customers will take virtually anything that is offered for free, they will not be willing to pay anything for an additional list or service unless they actually intend to use it and believe that it has value to them. WTA believes that 47 U.S.C. §227(j)(1)(B) expressly prohibits line item charges for robocall blocking services and additional charges for resolving complaints related to erroneously blocked calls, but

that it can reasonably be interpreted to allow charges for ancillary services such as blocked call lists that are not demanded or used by many, if not most, customers.

Third, it is not clear what amount and detail of information would be required to be included on the subject blocked call lists. A typical switch is likely to record the date and time of a call, the calling party number, the called party number, and the result of the call (answered, busy, not answered, sent to voicemail, invalid number, or blocked). It is not clear how valuable it is to a customer to know that his or her number was called at 2:15 pm on August 27, 2020 from 202-555-1212 and that the call was blocked. How much and what kind of additional information would need to be included on the customer's blocked call list in order for the list to be useful for informing the customer regarding the nature and source of the calls that have been blocked? And how much effort, time and cost would be required for the customer's voice service provider to locate and compile such information?

Fourth, it is not clear what time period would be covered by any required blocked call list. A typical switch is likely to retain the call information in the foregoing paragraph for two-to-four weeks. This means that every two-to-four weeks, a voice service provider is going to have to query its switch to pull out the blocked call information for each customer demanding a blocked call list. This query may or may not be able to be automated by various service providers. One WTA member estimates that it would take a staff member two hours per requesting customer every two-to-three weeks to query its system for calls to the specific customer, examine the details of each call to determine if it was blocked, and then record the information in a report. Depending upon the length of the reporting period and the number of customers requesting blocked call lists, a service provider is likely to need to develop a separate database to maintain its blocked call information and prepare and distribute periodic blocked call lists. Some WTA members believe

that a blocked call list requirement would require them to pay vendors for a custom solution to allow for blocked call data retention and storage.

Finally, without further information regarding the nature and extent of the contemplated blocked call list requirement, WTA cannot accurately estimate its costs. However, it appears that a blocked call list requirement can and will be quite expensive, both in terms of software modifications and additions, as well as additional labor.

For any and all of these reasons, the Commission should decline to require voice service providers to compile and provide periodic blocked call lists to their requesting customers, especially if they are not allowed to charge for what is likely to be an expensive ancillary service.

VII Conclusion

WTA reiterates that the key to the resolution of many of the robocall blocking issues raised in the *Order & FNPRM* is the development and implementation of an efficient, effective and economic alternative caller ID authentication framework for calls originating on the 40 percent or more of the voice service network where STIR/SHAKEN does not work due to the lack of a call path that is entirely IP from end-to-end. In addition to urging acceleration of the completion, approval and deployment of a cost-effective complement to STIR/SHAKEN, WTA: (a) opposes blocking solely on the basis of caller ID authentication, at least until a STIR/SHAKEN alternative is in place; (b) opposes blocking by intermediate voice service providers that have no relationship to the called parties who have the right to opt out of the blocking process; (c) supports a calling party verification process that begins with contacting the terminating voice service provider that is blocking calls; (d) requests further clarification of the “effective robocall mitigation programs” contemplated by the Commission and seeks clear legal authority (such as warrants, subpoenas and

safe harbors) to protect cooperating and participating service providers; (e) suggests that the Commission develop a rapid response team to deal with fraudulent robocallers; (f) requests that the Traceback Consortium be delegated specific powers as a Commission agent and that traceback requirements be limited to reasonable best efforts; (g) requests specific Commission-prescribed steps for dealing with bad traffic from both existing and new customers; (h) opposes network-based robocall blocking that would eliminate the right and ability of customers to opt out of the blocking of robocalls calls to them; (i) requests that notification and dispute resolution periods established for redress procedures take into consideration the small staffs of Rural LECs and other small voice service providers, and at least specify longer periods for small providers; and (j) opposes requirements for the periodic provision of free blocked call lists to requesting customers.

Respectfully submitted,
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