

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

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

**REPLY COMMENTS OF
TELNYX LLC**

Telnyx LLC (“Telnyx”)¹ respectfully submits these brief comments to the Federal Communications Commission (the “FCC” or “Commission”) in response to the Fourth Further Notice of Proposed Rulemaking (“FNPRM”) regarding robocall prevention methods.

Telnyx appreciates the FCC’s commitment to the fight against robocalling to protect consumers and bolster the security of the industry’s network. Herein, Telnyx comments on the need to create an industry standard for timely notifications of blocked calls using IP technology and widely used SIP codes. Additionally, Telnyx asks the Commission to implement a timeframe by which service providers must respond to blocking disputes to protect consumers against false-positive mishaps that block legitimate and wanted traffic.

1. The Commission should implement SIP code 608 as the call blocking notification standard for IP calls.

In response to the Commission’s request for comments on how service providers should be notified if and when their calls are blocked, Telnyx believes blocking notifications should be sent to the originating carrier. Given the industry’s migration to the IP network and the expectation that more calls will originate and terminate on IP networks via peering agreements due to the July 2021 SHAKEN/STIR implementation

¹ Telnyx is an interconnected voice over internet protocol (“VoIP”) provider with direct access to numbering resources pursuant to license from the Commission. Telnyx delivers voice, messaging and other telecommunications and telecommunications-related services via web-based platform and API to power global applications and next-generation communications companies.

requirement, Telnyx supports the use of SIP code 608 to signify that a call was blocked. SIP codes are widely used within the industry today and should be relatively easy to implement. In cases where calls are transmitted over TDM services, other methods of notification will need to be discussed by the industry.

2. The Commission should implement a time frame of three (3) business days for terminating parties to respond to blocking reports.

Telnyx applauds the Commission's implementation of a blocking dispute mechanism to correct mislabeling of legitimate calls as fraud. The Commission seeks further comment on whether to establish a time frame by which the blocking service provider must respond to a reported dispute. Telnyx recommends the Commission establish a time frame of three (3) business days for service providers to either correct the issue or respond to the disputing party. Today, it can take well over a week to have call completion issues resolved and Telnyx has seen the commercial impact of being unable to resolve such issues quickly and efficiently.

Telnyx's customer base includes doctor offices, pharmacies, and schools whose calls cannot afford to get caught in a terminating service providers' spam filters. When such false-positives do arise, these customers expect their service provider to provide an expedited resolution. Resolutions taking over three business days will cause significant commercial issues for smaller providers whose customers will migrate to larger service providers with the ability to whitelist their enterprise traffic and avoid any unwanted blocking. Establishing a three business day response time helps ensure continued competition within the call authentication framework. We encourage the Commission to request input from the industry on a suitable time frame for reporting inappropriate blocking.

Once again, Telnyx thanks the Commission for all of its ongoing efforts and appreciates the Commission's time in considering our foregoing concerns and suggestions. Pursuant to the Commission's rules, Telnyx is filing this notice electronically in the above-referenced dockets. Should you have any further questions or comments, please do not hesitate to contact us.

Respectfully submitted,

/s/ David Casem

David Casem
CEO, Telnyx LLC
311 West Superior, Ste. 504
Chicago, IL 60654
(312) 945-7420

August 31, 2020