

September 11, 2017

Via Electronic Delivery

EX PARTE NOTICE

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59; *Call Authentication Trust Anchor*, CG Docket No. 17-97.

Dear Ms. Dortch:

On September 7, 2017, James Garvert, William Reidway, Jr., Ken Politz, and the undersigned of Neustar, Inc. ("Neustar") met with Patrick Webre, Mark Stone, Kurt Schroeder, Micah Caldwell, Jerusha Barnett, John B. Adams (by phone), and Richard Smith (by phone) of the Consumer and Governmental Affairs Bureau ("CGB"), as well as Sherwin Siy of the Wireline Competition Bureau, to discuss issues in the above-referenced dockets.

The attached presentation, which was provided to the Federal Communications Commission ("Commission") participants in the meeting, formed the basis of Neustar's presentation. As part of the presentation, Neustar demonstrated commercial solutions that are becoming available soon on smartphones to combat illegal robocalling. This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,



Richard L. Fruchterman III  
Senior External Affairs Counsel

cc: Patrick Webre  
Mark Stone  
Kurt Schroeder  
Micah Caldwell  
Jerusha Barnett  
John B. Adams  
Richard Smith  
Sherwin Siy

# Combating Illegal Robocalling

Neustar Presentation to the FCC  
*September 7, 2017*

# FCC ROBOCALLING NPRM AND NOIs

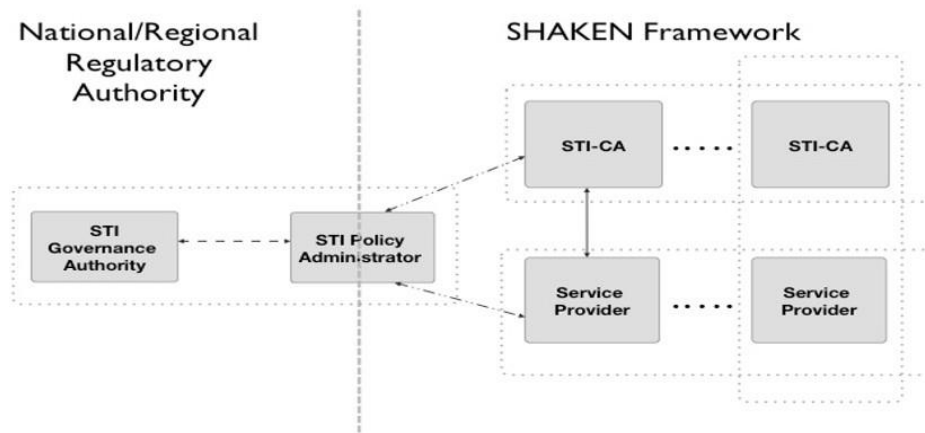
Neustar strongly supports the FCC's efforts to address illegal robocalling

- Significant source of consumer complaints both to operators and regulators
- Enterprises and consumers harmed by eroding faith in voice communications
- Fraudsters and other bad actors continue to improve methods that exploit weaknesses

Summary recommendations:

- Expedite the implementation of the STIR/SHAKEN framework proposed by ATIS & IETF:
  - Secure Telephone Identity-Governance Authority (STI-GA) – Direct the North American Numbering Council (NANC) to create a new Working Group to act as the STI-GA
  - Secure Telephone Identity-Policy Administrator (STI-PA) – Utilize Pooling Administrator as a means of quickly establishing STI-PA function
- Utilize Pooling Administrator to distribute invalid and unallocated number ranges
- Encourage adoption of commercial solutions (in place today) that empower consumers, enterprises, and carriers with secure and reliable caller identity information
- Encourage evolution of existing commercial solutions to incorporate additional tools (i.e. do-not-originate (DNO), unassigned / disconnected number lists, etc.)

# EXPEDITE STIR/SHAKEN FRAMEWORK – ESTABLISH THE STI-GA



Source: ATIS-1000080

FCC direction to NANC to create new Working Group to act as STI-GA would ensure and accelerate progress

- STI-GA governs policies and procedures around who can act as Certificate Authorities (STI-CAs) to issue certificates, and who can acquire certificates from the STI-CAs
- Builds on existing work done by ATIS and IETF

Benefits of new NANC Working Group as STI-GA:

- Quickly established
- Provides broad and fair industry representation as determined by the FCC
- Addresses STIR/SHAKEN topics in context of network evolution and consumer expectations

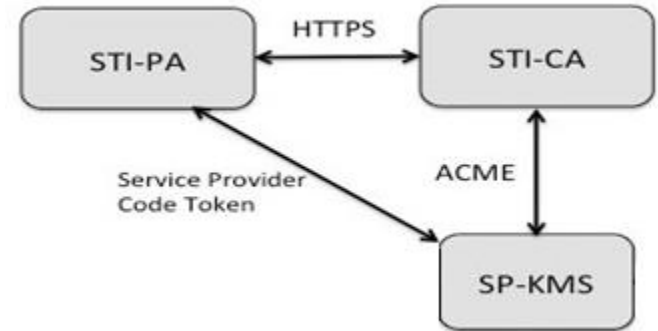
# EXPEDITE STIR/SHAKEN FRAMEWORK – ESTABLISH THE STI-PA

## Contract with Pooling Administrator to be STI-PA:

- STI-PA acts on authority of STI-GA to enforce policies
- Confirms service providers are authorized to request certificates
- Authorizes STI-CAs to issue certificates and maintains active list of approved STI-CAs
- Operates Public Key Infrastructure (PKI) for signing service provider tokens used during certificate validation by STI-CAs

## Benefits of Pooling Administrator as STI-PA:

- Modification to existing contract with FCC is fastest route to operationalize this function
- Material participant overlap (TDM-based and IP service providers)
- Neustar already providing PKI services to support Number Portability Administration Center (NPAC) and Top Level Domain (tld) registries
- Neustar developed commercial STIR/SHAKEN implementation in 2016, exclusively operates ATIS Robocalling Testbed, and already has a STIR/SHAKEN automated certificate management prototype
- Pooling Administrator contract subject to RFP in near future which can provide opportunity to modify its role if necessary



Source: ATIS-1000080

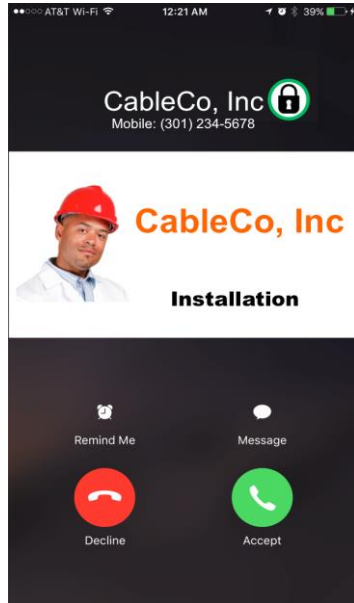
## COMMERCIAL SOLUTIONS AVAILABLE NOW

- Utilize existing CNAM infrastructure to warn consumers of suspect calls
- Interconnected with over 800 operators; available today across landline, cable, and VoIP phones
- Apply call pattern and behavior analysis to detect unwanted robocalling and suspicious activity
- Allow verified owners to specify which phone numbers do not originate calls to create an authoritative DNO blacklist



# COMMERCIAL SOLUTIONS AVAILABLE SOON

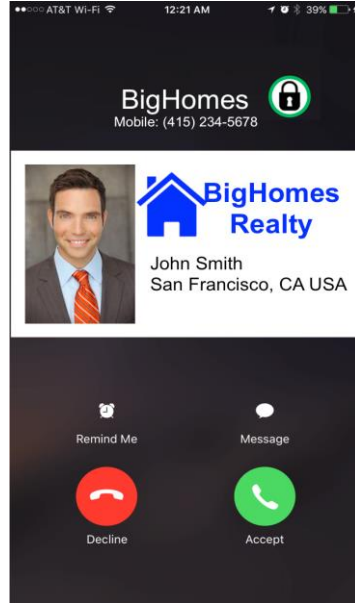
## Improve Operations



### Identify your field team

Reach a live customer to reduce truck rolls, gas costs, delivery attempts, and customer frustration.

## Optimize Engagement



### Personalize each call

E-business cards appear with each call or text, so users can identify the caller at a glance, to improve engagement.

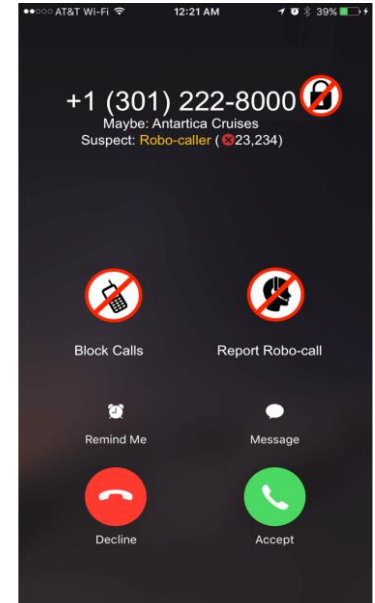
## Reduce Risk



### Grab Attention FAST

Establish authenticated context for critical situations. Grab attention to reduce risk & liability for you and your customer.

## Protect Consumers



### Stop Suspicious Callers

Flag suspicious numbers so users can easily block annoying and potentially dangerous callers.

# Demo