

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

In the matter of

:  
: CG Docket No. 17-97

Call Identification Trust Anchor

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**REPLY COMMENTS OF VINCENT A. LUCAS**

Once again, I thank Chairman Pai and this Commission for its leadership in addressing this issue of high importance to typical Americans. I addressed this issue in comments and reply comments that I submitted in CG Docket No. 17-59. I incorporate those comments by reference into this document. A copy of my reply comments in 17-59 is attached as an exhibit.

In response to Commissioner O’Rielly’s statement<sup>1</sup>, my Reply Comments in No. 17-59 argued that the government has a compelling interest in Caller ID authentication. I argued that the lack of caller ID authentication decreases the ability of the FCC and FTC to investigate consumer complaints of illegal calls, and increases the time and money needed to investigate such complaints. However, the problem is not just limited to these agencies. Lack of caller ID authentication makes fraud over the telephone easier to get away with. This costs state and federal law enforcement time and money to investigate fraud complaints. The IRS scam costs the IRS time and money. In short, consumer scams costs many government bodies time and money. Caller ID authentication would make it easier for the government to crack down on telephone-based scams, which would decrease the number of such scams, which would ultimately save the government money and benefit the public good.

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<sup>1</sup> His statement suggests that the government should not be “actively involved” in “[c]reating, facilitating, or mandating” caller ID authentication. I could not disagree more.

Caller ID authentication should be mandated by the government. I disagree with the suggestion that the government should not play an active role, should take a hands-off approach, etc. ATIS argues that “market forces are sufficient to encourage the continued adoption of SHAKEN”, but does not explain why market forces will do this. The operation of market forces requires a profit incentive to motivate companies. Companies must see a way to profit from adopting caller ID authentication or see that they will lose profits if they do not adopt caller ID authentication. The profit incentive for the widespread adoption of caller ID authentication is speculative at best.<sup>2</sup> The fact is that the caller ID authentication problem is decades old and the free market has not solved the problem on its own.

I agree in principle with the first four points of Comments of the Consumer Union, et al.<sup>3</sup> Caller ID authentication should be implemented as soon as practicable. Neustar’s Comments also agree that “The Commission Should Expedite Deployment of the SHAKEN/STIR

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<sup>2</sup> For example, a consumer’s telephone service provider might see an opportunity to increase profits by offering caller ID with authentication as an “enhanced caller ID feature” for an extra charge. However, caller ID authentication requires the caller’s service provider to cooperate with the authentication. The caller’s service provider may see that implementation of authentication will cost them money and not see a way to increase its own revenue by providing authentication. Thus, without a profit incentive, the caller’s service provider would choose not to authenticate. Thus, calls originating from that service provider would not be authenticated, even if the call recipient’s service provider would gladly participate in the caller ID authentication system. Furthermore, a few VoIP service providers are bad actors that knowingly profit from its clients’ illegal telemarketing calls. See my Comments in Doc. No. 17-59 at 6 n.8. Such companies definitely would have a profit motivation not to cooperate in authentication. Thus, one should be highly skeptical of the claim that “market forces” alone would be sufficient to motivate the widespread adoption of SHAKEN/STIR.

<sup>3</sup> “1. The FCC should direct voice providers to implement caller ID authentication by the end of 2018, at no cost to consumers. 2. The FCC should direct voice providers to offer consumers the option of blocking calls that fail to verify their caller ID information, for no extra charge. 3. All voice customers, including those using traditional wireline service, should have effective protections from fraudulently spoofed calls. 4. The caller ID authentication system should protect consumers from fraudulently spoofed calls originating overseas. 5. Consumers should be given the option of verifying the legitimacy of calls they make while withholding their personal identifying information from the call recipient.”

Framework.” I am not in a position to comment on whether the end of 2018 would be practicable. With regard to their fifth point, the call recipient should be given the option to automatically block any call in which the caller deliberately blocks Caller ID information.

Regarding Comments of American Financial Services Association (AFSA), what needs to be authenticated is that the call comes from the telephone number that it purports to come from. The primary concern of the authenticated caller ID system should be accuracy of the information. See my Reply Comments in CG Doc. No. 17-59 at 6. AFSA’s concerns would be addressed by adopting my proposal that the authenticated caller ID information should contain both the true telephone number from which the call originates plus an optional “reply-to” telephone number (a number at which the caller would prefer to receive calls back). See my Comments in Doc. No. 17-59 at 7. This is analogous to the functions of the “From” and “Reply-To” fields in email. Caller ID display systems created in the future could display both the From and Reply-To numbers.

Respectfully submitted,

Vincent A. Lucas, Ph.D.