

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP

BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
SALVATORE TAILLEFER, JR.

2120 L STREET, NW
WASHINGTON, DC 20037

(202) 659-0830
FACSIMILE: (202) 828-5568

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ARTHUR BLOOSTON
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AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

HAROLD MORDKOFKY
OF COUNSEL

EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

WRITER'S CONTACT INFORMATION

sta@bloostonlaw.com

202-828-5562

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, CG
Docket No. 17-59; Call Authentication Trust Anchor, WC Docket No. 17-97

Dear Ms. Dortch:

On September 12, the Alarm Industry Communications Committee (AICC) met separately with Zenji Nakazawa of Chairman Pai's office; Ariel Roth of Commissioner O'Rielly's office; and Jerusha Burnett, Karen Schroeder, Kurt Shroeder, and Kristi Thornton of the Consumer and Governmental Affairs Bureau to discuss the above-referenced proceedings. Each of the meetings was attended on behalf of AICC by Ben Dickens, Mary Sisak, and Sal Taillefer of this law firm.

At the meetings, AICC discussed its concerns regarding the likelihood of calls made by central station alarm monitoring centers being blocked or mislabeled by the major voice service providers implementing call blocking analytics, as set out in its comments,¹ reply comments,² and Petition for Clarification or Reconsideration.³ Specifically, AICC emphasized the need for a mechanism to ensure that calls made by central station alarm monitoring centers in response to

¹ Comments of AICC, CG Docket No. 17-59 and WC Docket No. 17-97, filed July 24, 2019.

² Reply Comments of AICC, CG Docket No. 17-59 and WC Docket No. 17-97, filed August 23, 2019.

³ Petition for Clarification or Reconsideration of AICC, CG Docket No. 17-59 and WC Docket No. 17-97, filed July 8, 2019.

alarm signals are never blocked, such as through a critical call list. Given the variety of methods through which voice service providers may implement call blocking – including the use of private third-party blocking providers – and the number of voice service providers, it would be impossible for alarm companies to individually secure whitelist status with every possible call blocking entity.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Salvatore Taillefer, Jr.
Counsel to the Alarm Industry
Communications Committee

CC: Zenji Nakazawa
Arielle Roth
Jerusha Burnett
Karen Schroeder
Kurt Shroeder
Kristi Thornton