



November 1, 2017

VIA Electronic Submission

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 (Second Notice of Inquiry - CG Docket No. 17-59)

Dear Ms. Dortch,

Danal, Inc. ("Danal") deeply appreciates and welcomes the FCC's desire to provide businesses better protection measures from erroneously reaching out to consumers in possession of reassigned numbers. However, the FCC's proposed reassigned numbers database ("Database") will not address the present TCPA compliance issue entirely. Rather it will address only a very narrow segment of TCPA compliance issues and is not a comprehensive solution.

The Database the FCC envisions is limited to number reassignment history only. Thus, it does not definitively identify any given number's true owner. Deactivation is one component of correctly identifying the owner behind a number. Additional data points, such as reactivation history and porting history, collectively with reassignment history can create intelligence around a number that is far more valuable than reassignment history alone.

Danal has worked with carriers and industry experts on TCPA requirements to create a holistic TCPA compliance solution that is driven by carrier data to identify any given number's true owner. Our comprehensive TCPA compliance solution includes, but is not limited to, data around reassignments, deactivations, ports, and ownership verification.

Testing and commercial use by our clients have proven the solution to be reliable and effective. We recommend that the FCC test our TCPA compliance solution directly to confirm our clients' experiences. If it passes the FCC's standard, we suggest that the FCC certify our solution a valid and FCC approved TCPA compliance solution.

Unfortunately, there are a number of TCPA compliance solutions that do not provide the same quality of data as Danal, yet brand themselves as having the same solution. Such a certification from the FCC would assist Danal overcome various market misconceptions regarding carrier data based TCPA compliance solutions. More importantly, the certification would provide businesses seeking compliance sound guidance in their vendor selection process.

Additionally, we would like to propose a safe harbor program for the businesses that utilize any FCC certified TCPA compliance solution. This will motivate businesses to adopt a TCPA compliance solution thereby greatly reducing the number of TCPA violations and ultimately benefiting consumers.

Kind regards,


Shane Martin
Vice President of Finance