

November 15, 2021

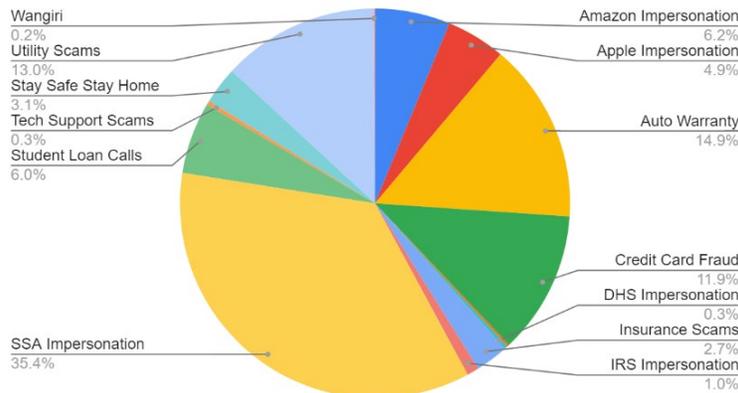
Marlene Dortch  
 Secretary  
 Federal Communications Commission  
 445 12<sup>th</sup> St. SW  
 Washington, D.C. 20554

**Re: Enforcement Bureau Requests Information on the Status of Private-Led  
 Traceback Efforts of Suspected Unlawful Robocalls, EB Docket No. 20-195**

Dear Ms. Dortch:

On behalf of the Industry Traceback Group, LLC ("ITG"), USTelecom – The Broadband Association ("USTelecom")<sup>1</sup> is pleased to report on the ITG's efforts to trace back the origin of suspected unlawful robocalls and coordination with the Commission.<sup>2</sup> In its second year as the single consortium designated by the Commission's Enforcement Bureau registered to conduct private-led traceback efforts,<sup>3</sup> the ITG continues to help advance the mission to eliminate illegal robocalls. Since January 2021, the ITG has initiated nearly 2,900 tracebacks, representing hundreds of millions of illegal robocalls. Campaigns traced back range from impersonations of government agencies to tech support scams, loan or credit card scams, threats to disconnect utility services and impersonations of brands to sell a product or service, among many others.

Active Campaigns 2021



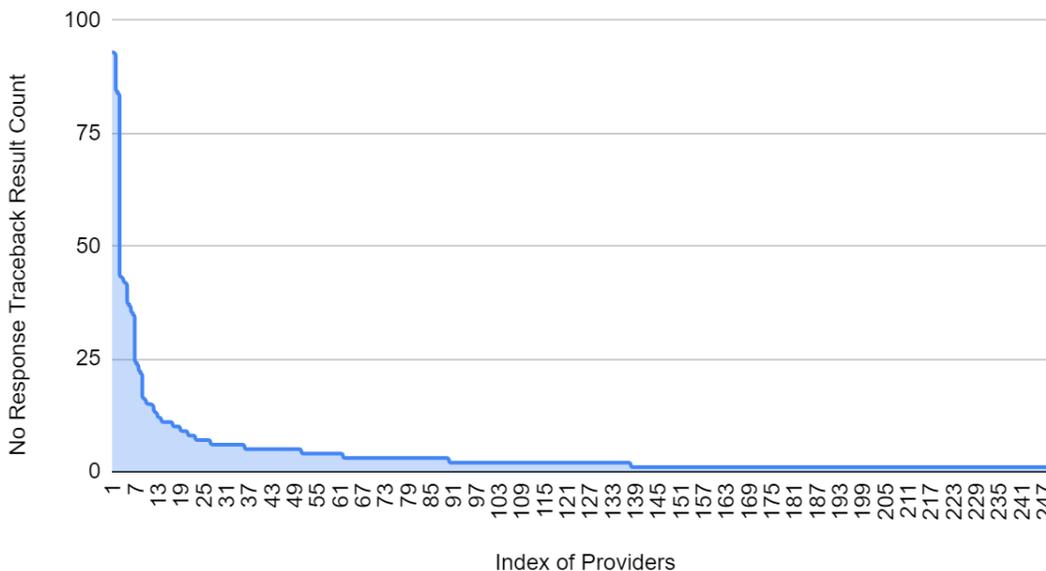
<sup>1</sup> USTelecom is the premier trade association representing service providers and suppliers for the communications industry. USTelecom members provide a full array of services, including broadband, voice, data, and video over wireline and wireless networks. Its diverse membership ranges from international publicly traded corporations to local and regional companies and cooperatives, serving consumers and businesses in every corner of the country. USTelecom leads the Industry Traceback Group, LLC ("ITG"), a collaborative effort of companies across the wireline, wireless, VoIP and cable industries actively working to trace and identify the source of illegal robocalls.

<sup>2</sup> See Public Notice, *Enforcement Bureau Requests Information on the Status of Private-Led Traceback Efforts of Suspected Unlawful Robocalls*, DA 20-786 (rel. July 27, 2020).

<sup>3</sup> See *Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)*, Report and Order, EB Docket No. 20-22, DA 21-1047 (rel. Aug. 25, 2021).

This year, nearly 400 domestic and foreign voice service providers have participated in tracebacks so far. Tracebacks have identified 121 U.S. providers originating illegal robocalls, 111 that have brought the calls into the country, and 115 foreign providers originating the illegal traffic. Although some domestic and foreign providers still do not cooperate, as the chart below demonstrates, a handful of non-cooperating providers disproportionately show up in tracebacks.

10% of Providers Responsible for 55% of No Response Tracebacks



The ITG appreciates its continued close partnership with the Commission, as well as other federal and state enforcers. The ITG has responded to over 70 subpoenas and civil investigative demands in 2021 from 18 distinct federal and state government agencies. The ITG provides regular reporting to federal and state law enforcement, including on the providers most frequently identified as originating illegal robocalls as well as those putting the robocalls on the United States telephone network. The ITG also holds a monthly enforcement call with representatives of numerous federal and state government agencies.

The ITG continues to make investments in technology and operations to increase the efficiency, scale, and impact of the traceback effort. Enhancements over the last year include:

- Eliciting additional structured data from originating providers about the robocallers, including a traffic estimate, certain technical information, and specific actions to mitigate the traffic;
- Making additional information accessible to providers in the ITG traceback portal, including whether their upstream providers were originators or Points of Entry for the traffic traced through their networks;
- Deploying automated reporting functionality, including to respond to subpoenas, as well as new administrator functions and features to better group and search across traceback results;
- Developing an API to automatically ingest robocall campaign data from partners and an API to automate traceback responses;

- Launching tracebacks.org to provide more information to domestic and foreign providers, government partners, and other stakeholders about traceback and the ITG's operations;
- Establishing simple-to-remember email addresses for subpoena submissions, traceback requests, and support; and
- Making several security and resiliency enhancements.

USTelecom and the ITG stand ready to continue to assist the Commission and other government and industry stakeholders in stopping the scourge of illegal robocalls. The ITG encourages the Commission to continue its work with federal and state law enforcement partners to bring aggressive enforcement against robocallers at home and abroad, as well as those voice service providers responsible for the robocall problem.

Please contact the undersigned if you have any questions.

Sincerely,

/s Joshua M. Bercu/

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Vice President, Policy & Advocacy  
USTelecom

Jessica Thompson  
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USTelecom