



December 6, 2018

VIA ELECTRONIC FILING

The Honorable Ajit Pai, Chairman
The Honorable Michael O’Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Petitions for Declaratory Ruling on Regulatory Status of Wireless Messaging Service*,
WT Docket No. 08-7

Dear Chairman Pai and Commissioners,

CTIA and our member companies’ strongly support the *Draft Declaratory Ruling* on wireless messaging. By taking this action, the FCC will stand firm with millions of wireless consumers in the battle to safeguard messaging from unscrupulous robotexters who want to send unwanted, malicious, and unlawful mobile messages.

For over 25 years, messaging has remained a largely spam free environment, while evolving into a competitive, innovative ecosystem that delivers text, video, and, of course, emojis. Today, consumers use mobile messaging more frequently than any other communications service.



of surveyed consumers use SMS more than once a day, compared to 56% who use email the same amount and 54% who use voice.

Source: CTIA Morning Consult Survey (2018)

And competitive messaging services are flourishing, led by over-the-top (OTT) messaging applications, such as WhatsApp and Facebook Messenger.



of all messaging traffic is generated from OTT messaging apps.

Source: Ovum (2018)

Mobile messaging is a most trusted medium because of the significant efforts wireless providers take to prevent unwanted and malicious messages from spamming consumers. As the *Draft Declaratory Ruling* notes, wireless providers have worked hard to protect consumers from unwanted messages, such as pay-day lending schemes and fraudulent bank notifications that prey on our most vulnerable consumers.



of surveyed consumers report they receive the most unwanted communications by text messages/SMS, while nearly 90% report voice or email as the source of the most unwanted communications.

Source: CTIA Morning Consult Survey (2018)

The *Draft Declaratory Ruling* will help ensure that providers retain the ability to fight back against this harmful traffic and maintain trust in messaging's reliability and convenience. Consumers, moreover, have made clear that they want wireless providers protecting them from robotexts.



of surveyed consumers support wireless providers efforts to identify and block spam.

Source: CTIA Morning Consult Survey (2018)

In sum, the *Draft Declaratory Ruling* sends a strong signal to consumers that the FCC has their back in the fight against unwanted robotexts. For this reason, CTIA fully supports the *Draft Declaratory Ruling*, and I urge you to adopt the item at the Commission's December 12, 2018 Open Meeting.

Sincerely,



Meredith Attwell Baker
President and Chief Executive Officer, CTIA