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December 6, 2018

**VIA ELECTRONIC SUBMISSION**

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

Re: WT Docket No. 08-7

Dear Ms. Dortch:

On December 3, 2018, AT&T representatives Joan Marsh, Senior Vice President, Regulatory and State External Affairs, Hank Hultquist, Vice-President, Federal Regulatory, and I met separately with Erin McGrath, Legal Advisor to Commissioner Michael O’Rielly and Umair Javed, Legal Advisor to Commissioner Jessica Rosenworcel, to discuss the FCC’s Draft Declaratory Ruling in the docket referenced above.

AT&T wholeheartedly supports the FCC’s proposed ruling which appropriately declares that wireless messaging (SMS/MMS) are information services and are not Commercial Mobile Services nor telecommunications services subject to common carrier regulation under Title II. This classification ensures greater consistency in the regulatory treatment of these services across the messaging ecosystem. The Draft Declaratory Ruling empowers wireless providers to continue protecting consumers from unwanted text messages thereby keeping messaging services relatively spam-free.

AT&T is leading efforts to maximize delivery of messages while protecting consumers from spam as the industry transitions A2P traffic to ten-digit long codes (10DLC) which include:

- making available dedicated A2P message class and sender IDs to identify trusted traffic and minimize inadvertent blocking,
- introducing a “tagging” pilot which assigns a trust level to traffic from trusted senders subjecting it to more limited spam filters, reducing the potential for inadvertent blocking and time to rectify any blocking issues,
- adopting an AT&T Code of Conduct with simple rules and recommendations for aggregator partners such as sending practices designed to help legitimate A2P traffic flow freely and avoiding practices adopted by spammers,
- creating Feedback Loops to proactively inform aggregators of operational spam issues as they are discovered,

**AT&T**

- developing a pilot False Positive Portal allowing aggregators to efficiently report inappropriate blocking and request unblocking.

AT&T and its vendors continue diligently addressing any false positive reports received through existing processes.

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with your office for inclusion in the public record of the above referenced proceeding. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Celia Nogales", written in a cursive style.

Celia Nogales

CC:

Erin McGrath

Umair Javed