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FCC Room
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December 27, 2014

Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20554
Re: CG Docket No. 02-278

Received & Inspected

JAN - 0 2015

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Please accept these comments in regard to upcoming proceedings considering changes to the options available in handling "robocalls" in our telecommunications systems.

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Thanks,



Bruce Carver

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I'd like to provide a consumer perspective on this issue, as the recipient of countless unwanted telephone calls in recent months.

As of this past summer we were no longer able to answer our home telephone due to the increasing prevalence of:

- Repeated & incipient unwanted calls from entities with no valid connection to us
- Calls no identified in caller ID, unwanted, unknown, invasive, potentially fraudulent and manipulative callers
- This includes charities, "research" organizations, political organizations and "businesses"

Multiple unwanted calls were arriving every day of the week between 5 and 9 PM, many without caller ID identification or with varying, misleading or obviously fraudulent ID data.

It was necessary to purchase, install and configure a "call blocking" device locally, in our home, to prevent the following types of calls from reaching us:

- Any call without a caller ID, whether it's withheld or otherwise unavailable
- All "international" and "out of area" callers
- Selected numbers we have identified in the above categories as abusing the public phone system.

We are using the product "CPR CallBlocker" manufactured in the United Kingdom in addition to the NoMoRobo service in parallel with the Vonage service that hosts our home phone. It was necessary to combine the two techniques to arrive at a reasonably effective solution.

From a slightly broader consumer perspective I'd like to offer the following points:

- The public telephone system was a valuable public service that supported household level communications and triggered a wave of innovation we continue to ride today. It is rapidly being superseded by technologies that include much more sophisticated filtering options. If those same filtering features are not offered in this system, I will consider it "dead" and simply move on to something that works better for me.
- As a public facility it comes both with rights and obligations. With the invasive right to ring a bell in my home and attract my attention from the other valuable pursuits of my life comes the obligation of the caller to have some valid reason to do so. Requests to purchase some unknown good or service, to donate to a meaningful cause, to vote for the caller or to answer "research" questions, sadly, do not meet my "validity" test.

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- What once worked at the scale of a 1930's technology no longer works at the scale of the 21st century. The assumptions and morays of that era failed to carry into the current times – they failed to keep up with the robotics of the electronic world. The ethics are the same – but the ability to abuse them has been enhanced.
- It would be better to implement filtering in a public system as a shared resource rather than forcing each individual consumer to implement their own telephone system. To do otherwise undermines an otherwise creative, innovative and productive service.
- All of these points have direct analogies in other personal technologies such as cell phones, texting and e-mail. We need common agreement on the protocols of contact over these systems. Privacy is a common dimension between them – but I'll leave that for yet another time and place as it's not directly being addressed in this request for comments.

Thank you for the opportunity to comment on this matter.