



REDACTED – FOR PUBLIC INSPECTION

February 5, 2015

VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

Re: CG Docket No. 02-278 and CG Docket No. 05-338

Dear Ms. Dortch:

At the request of the Consumer and Governmental Affairs Bureau (“CGB”), on February 3, 2015 Becky Burr, Bill Reidway, Dorean Kass, Andy Stickel and the undersigned, all of Neustar, Inc. (“Neustar”), met with Mark Stone, Kurt Schroeder, Aaron Garza, John Adams and Kristi Lemoine of CGB to discuss Neustar’s products that assist companies in mitigating the risk of Telephone Consumer Protection Act (“TCPA”) violations. In particular, Neustar discussed how its products can help with the problem of telephone numbers that have been reassigned between the time that a consumer has consented to receive a telemarketing call on a telephone number and the time that a call is placed to that number.

At the outset, Neustar informed the CGB representatives that it is not aware of any telecommunications industry databases that track all disconnected or reassigned telephone numbers. Per guidelines established by the industry, disconnected residential numbers are to be placed back in circulation within 90 days, though in many cases numbers are recycled at a much faster pace; disconnected business numbers are to be placed back in circulation within a year. In response to a later question, Neustar told the Commission that it is not aware of any authoritative telecommunications industry database that links all consumer names with their telephone numbers.

Neustar explained that it has two products that companies use to mitigate their risk of violating the TCPA. The first of these, the Intermodal Ported Telephone Number Identification Service, helps companies avoid calling telephone numbers assigned to wireless carriers. Drawing on data



Neustar recently added the capability to evaluate the likelihood of whether a telephone number has experienced a disconnect event since the date when consent was initially obtained. [BEGIN  
CONFIDENTIAL INFORMATION] [REDACTED]  
[REDACTED] [END  
CONFIDENTIAL INFORMATION]

Neustar was asked whether its service can address the challenges presented with “Family Plans”, namely situations where different members of a family plan have different surnames. Neustar responded that, because it uses a variety of sources for its data and is not reliant solely on carrier subscriber data, it can often verify such users.

Neustar’s customers pay for the TCPA Mitigation service based on the number of queries that are submitted for verification. While the product has customers across the board, Neustar’s current customer base is primarily mid-sized to large companies.

Neustar concluded by reiterating that its TCPA Mitigation service is not a silver bullet for TCPA compliance but is a tool that companies can use, in conjunction with other services, to reduce their TCPA exposure and to spare consumers from unwanted calls, while also driving operational efficiencies and performance.

Sincerely,



Richard L. Fruchterman, III  
Associate General Counsel

cc: Mark Stone (via email)  
Kurt Schroeder (via email)  
Aaron Garza (via email)  
John Adams (via email)  
Kristi Lemoine (via email)