



Text Interactions  
PO Box 422  
Red River, NM, 87558

The Honorable Tom Wheeler Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: Twilio Petition: WT Docket No. 08-7

Dear Chairman Wheeler,

Text Interactions offers communication services for sporting event participants on an opt in basis. We filed comments on this petition on March 21, 2016 to describe blocking by the mobile carriers resulting in some of our customers being unable to receive lawfully distributed messages.<sup>1</sup>

Since filing our initial comment, Text Interactions has experienced a worsening of arbitrary carrier filtering of lawful messages. As co-founder of the company, I, Robert Swan, file this comment to describe a recent interaction I had as a customer of Verizon.

On April 30, 2016 I was participating in a motorsport event in Amarillo, Texas. Other participants and I had opted in to a text messaging service through Text Interactions in order to receive information from the event director during the course of the event. On the morning of April 30th the MMS messages stopped being delivered causing much confusion, discontent, and anger among the Verizon subscribers in attendance.

On May 5th I called Verizon's customer service department in order to find out why the messages had not been delivered during the event and why they were still not being delivered. On May 10th, I received a message from a technical support staff member asking me to attempt to use the service and to see if the MMS messaging would now come through. The messaging was now functioning

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1 <http://apps.fcc.gov/ecfs/comment/view?id=60001512309>

and I was advised to again call customer service for further explanation of the issue.

Further explanation by customer service did indeed reveal the fact that Verizon had blocked all messages and marked them as "SPAM". I asked the customer service representative to email me a copy of the technical department's report on the issue. The customer service rep agreed and sent me an email with the internal reasoning for the block: "The originating MDN was blocked for spam at the MMS carrier. This block has since been removed, but a spam block can be instituted again, based on message volume. The persons involved may wish to investigate Verizon Enterprise Messaging."

*(See attached "Exhibit A")*

This experience is concerning for a number of reasons.

First, the messages blocked were time-sensitive and related to a one-time event, In addition to the fact that the messages should never have been blocked as spam in the first place, it wasn't helpful that the block was removed a full ten days after the event took place.

Second, the messages were clearly not spam. Verizon confirmed this by reversing the block. The blocked messages were to be sent in response to a user-initiated opt in. The messages contained information that I had directly requested to receive by texting a specific code to Text Interactions service for this particular event.

Third, Verizon offered to sell me separate, more expensive product in response to my questions about how to ensure that my messages would be delivered in the future. In addition to trying to upcharge me to deliver messages that should simply work, the suggestion of using Verizon Enterprise Messaging would not solve this blocking. The recipients of Text Interactions are not employees, but rather unaffiliated individual end users attending one-time events.

Fourth, in my interactions with the Verizon customer service department I was advised to call Verizon's Enterprise and Business Department in response to my asking how this could be prevented in the future. I spoke to a man named "James" and was told that it was not possible to prevent blocking messages from a specific number if a large amount of text messages were being sent regardless whether the end user had requested to receive the messages or not.

Verizon's User Agreement clearly states "We reserve the right to block unsolicited messages but you may receive them." Nowhere in the user agreement does it state that solicited messages will be blocked if many are sent at one time. Verizon's actions are in direct conflict with the user agreement and constitute a direct breach of the agreement between myself and Verizon.

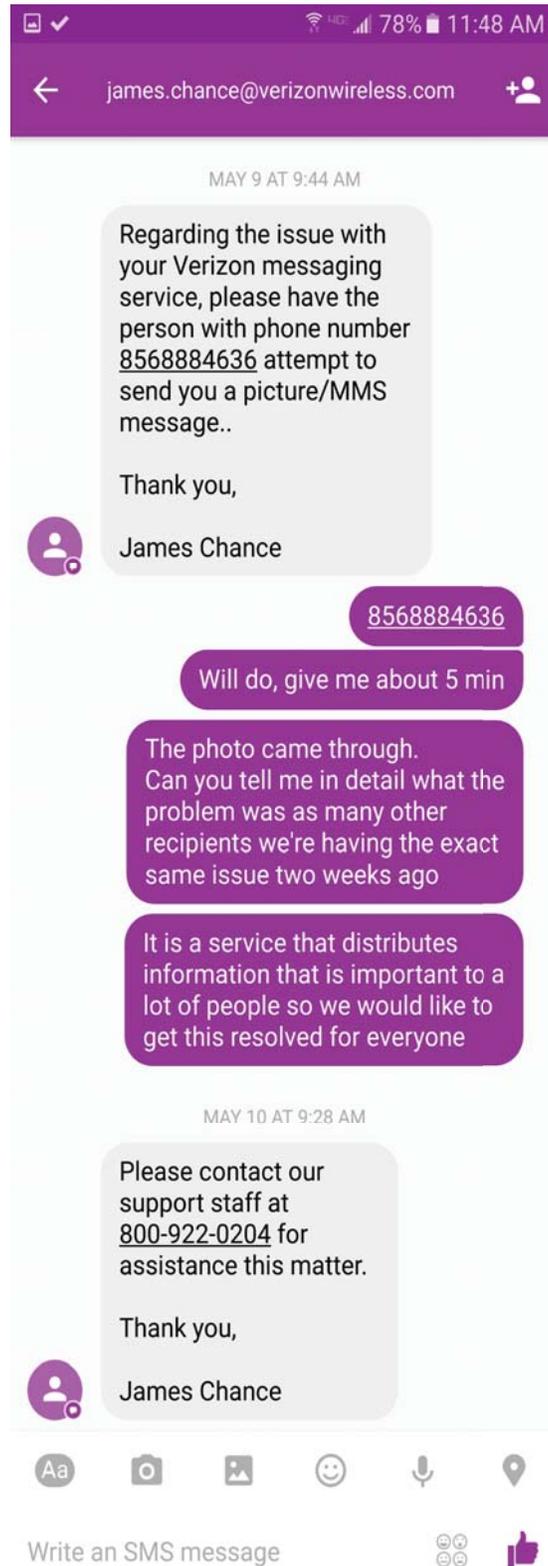
Consumers should receive the messages they opt in to receive and carriers shouldn't hold their customers' communications hostage just to try to force traffic in a paid prioritization model.

We urge the FCC and all parties involved to find a resolution to this issue that will address the concerns of business and consumers.

Best Regards,  
Robert Swan  
Text Interactions

## EXHIBIT A

Text Conversation with Verizon:



## Email from Verizon:

We'd love to help. 



**Verizon Wireless** <NotificationOnly@ecrmemail.verizonwireless.com> [Unsubscribe](#)  
to me 

May 12 (5 days ago)

We're reviewing your request as we speak.



[Shop](#) [Support](#) [My Verizon](#)

## Let's make things happen.

Thanks for reaching out to us for help. We've processed your request.  
To recap, here's what we've done:

**The originating MDN was blocked for spam at the MMS carrier. This block has since been removed, but a spam block can be instituted again, based on message volume. The persons involved may wish to investigate Verizon Enterprise Messaging.**

If you need anything else, please visit us [online](#) or via My Verizon Mobile.  
If you have questions about this request, feel free to give us a ring at [1.800.922.0204](tel:1.800.922.0204) or dial \*611. We're open 7am - 11pm Mon-Fri and 8am - 9pm Sat/Sun local time.

As always, thanks for choosing us. We appreciate you.

Yours truly,  
The Verizon Wireless Customer Service Center