

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	CG Docket No. 12-38
Structure and Practices of the Video Relay	)	
Service Program; Telecommunications Relay	)	CG Docket No. 10-51
Services and Speech-to-Speech Services for	)	
Individuals with Hearing and Speech Disabilities	)	CG Docket No. 03-123
	)	
Consumer & Government Affairs Bureau	)	
Seeks to Refresh the Record Regarding	)	
Misuse of Internet Protocol Relay Service	)	
	)	
To: The Commission	)	

**COMMENTS TO FNPRM ON STRUCTURE AND PRACTICES  
OF THE VIDEO RELAY SERVICES PROGRAM  
AND MISUSE OF INTERNET PROTOCOL RELAY SERVICE**

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## COMMENTS ON FURTHER NOTICE OF PROPOSED RULEMAKING

Experian Information Solutions, Inc. (“Experian”) is part of the leading global information services company, with Experian and its world-wide affiliates providing data and analytical tools to clients in more than 80 countries. The company helps businesses to manage credit risk, prevent fraud, target marketing offers and automate decision making. Experian also helps individuals to check their credit report and credit score, and protect against identity theft.

Our company is responding to the Federal Communications Commission (the “Commission”) proceeding on reforming the Video Relay Services (“VRS”) industry and the IP-Relay (“IP Relay”) industry, specifically commenting on the topic of identity verification and risk management in connection with the contemplation of the deployment of a centralized Video Relay Services User Database (“VRSURD”) or any centralized database used in the process of delivering various forms of Internet-based relay services to consumers. Our comments herein would apply to the VRSURD regardless of which ultimate reimbursement mechanism the Commission adopts in paying providers for the services they deliver to consumers.

Recently in these proceedings, Purple Communications, a provider of various forms of Internet-based relay services, made reference to Experian’s Precise ID product,<sup>1</sup> and we would like to take this opportunity to elaborate on the types of tools that may be useful to the FCC as it contemplates the evolution of its management of Internet-based forms of relay services.

Among Experian’s specialties are our analytics tools, which enable organizations with large customer bases to manage and automate huge volumes of day-to-day decisions. Experian’s clients include international banks, utility companies and public service providers, who rely on our predictive tools and sophisticated software to control decision-making at all points of contact

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<sup>1</sup> March 8, 2012, Purple Communications, *Comments to FNPRM on Structure and Practices of the Video Relay Services Program*, page 12; <http://apps.fcc.gov/ecfs/document/view?id=7021899196>

with customers. Within our Decision Analytics business unit, we provide a range of services aimed at risk management and fraud mitigation, including the Precise ID<sup>SM</sup> solution referenced in Purple's filing (see Exhibit 1 for a whitepaper on identity proofing that includes a description of Precise ID).

Precise ID is utilized by hundreds of clients across multiple industries, including financial services, telecommunications, utilities, merchants, healthcare, and government agencies. Specific to government agencies, Precise ID has been selected to provide identity proofing to agencies such as the Social Security Administration and Centers for Medicare and Medicaid Services.

Based on our present understanding of the mechanics of how Internet-based relay services work, and as subject matter experts in the area of risk mitigation and fraud deterrence, we believe the following principles are important in the Commission's contemplation of any such system, regardless of who provides the solution.

- (1) Single, Centralized System – Experian believes in closing any potential loopholes for access by having a homogenous system used by all participants (in this case, consumers and providers) with a common set of standards.
- (2) Respectful of Consumer Privacy – Experian's identity proofing services are able to assess risk of identity fraud with minimal personally identifiable information. Identity proofing transactions are conducted via highly secure access channels, and data is stored with similarly highly secure architecture.
- (3) Administered by a Disinterested Third Party – As we understand the role of Neustar, they are under contract to the Commission to manage and implement the Internet-based 10-digit numbering system. We think this model for registration and

verification is the right approach for the Commission and the types of fraud prevention and identity verification tools available through Experian or any other company chosen by the Commission, with proper collaboration, could be easily integrated into the existing system already under management by Neustar. Allowing a third party such as Experian to provide identity proofing services creates a consistent, objective, and measurable set of decisioning policies to be invoked. Data assets utilized in Precise ID identity proofing do not rely upon consumer self-reported or manipulated information.

- (4) Flexible Enough to Adjust to Pattern Changes – Precise ID delivers a risk-based approach to identity proofing that includes the combined and cross-referenced use of analytics (predictive models designed to assess level of fraud risk), identity element verification and validation, the presence or absence of high risk conditions, historical identity transaction records to ensure consistent use of identity elements over time, and out-of-wallet (knowledge-based authentication) questions designed to be answerable by true-name persons, and more obstructive for identity thieves and fraud artists.

## **Summary**

Experian believes its fraud prevention and identity verification tools are well suited to assist the Commission in addressing its concerns pertaining to risk mitigation and avoiding suspicious or duplicative registrants to iTRS. Experian welcomes the opportunity to discuss this filing with the Commission at its convenience.

**EXHIBIT 1**

[Experian White paper on Identity Proofing Attached]