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Public Comments on Implementation of the Truth in Caller ID Act of 2009:=====

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The proposed regulation is weak and will not work at all.

"We propose rules that would prohibit any person or entity in the United States, with the intent to defraud, cause harm, or wrongfully obtain anything of value, from knowingly causing, directly or indirectly, any caller identification service to transmit or display misleading or inaccurate caller identification information."

Junk faxers and prerecorded callers moved to Canada or to using a Canadian service some time ago to get around the US regulations and to make it more complicated to prosecute them. It's worked for them. Sometimes the Canadian involvement seems contrived and it's all Americans. But they are not stupid, they can muddy the waters this way and they did.

The only way this proposal can be effective for the purpose intended is if the telco that ultimately delivers the caller ID data to the ringing phone, your local telco, is equally responsible for the correctness of that data. Financially responsible.

This will immediately result in the telephone companies securing the caller ID system to prevent their own liability, something they have found unnecessary up till now. This will make it necessary.

They created the system that allows this troubling spoofing to take place. They are the *\*only\** ones who can fix it.

I have said this for years. In these cases the only party that can be made responsible for the data appearing on your phone is the one that provides your own dialtone. They are substantial companies and cannot hide.

If AT&T had to pay out \$11,000 in fines or civil penalties they would be out there at their crooked customer's NID with a pair of wire cutters. They will enforce behavior on the part of their customers in their own business self interest.

It's the only thing that will work.

Expect telcos to be against this proposal, but insist they fix their insecure system in any case. They are the only ones who can. They should start now.