

## ISSUE:

Incorrect Originating Location Information  
Toll Free Numbers

FCC Meeting  
June 17, 2014

# AGENDA

Introductions

Description of Situation

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Real Business Results

- ❖ Causes calls to fail
- ❖ Leads to incorrect Legal Disclosures
- ❖ Results in Billing Errors
- ❖ Beyond 800

Bob Beatty

Jean Mc Gavin

Chris Gose

Robert McCausland

Privacy Issues

David Greenhaus

Technical Options

Michael Rothchild

Next Step

## WHY ARE WE COMING TO THE FCC

- This issue was first identified at least ten years ago
- Organizations like SNAC and NANC have been aware of the issue for years, but nothing has been done. In fact now those organizations are suggesting that the solution wait until the IP network implementation years from now
- The issue grows every year as cell phones increase, local numbers are ported, and some carriers find ways to “game” the system by sending invalid originating information
- Companies like the ones represented today are being harmed today and their businesses cannot wait a prolonged period of time to have the FCC decision enforced

Title 47: Telecommunication

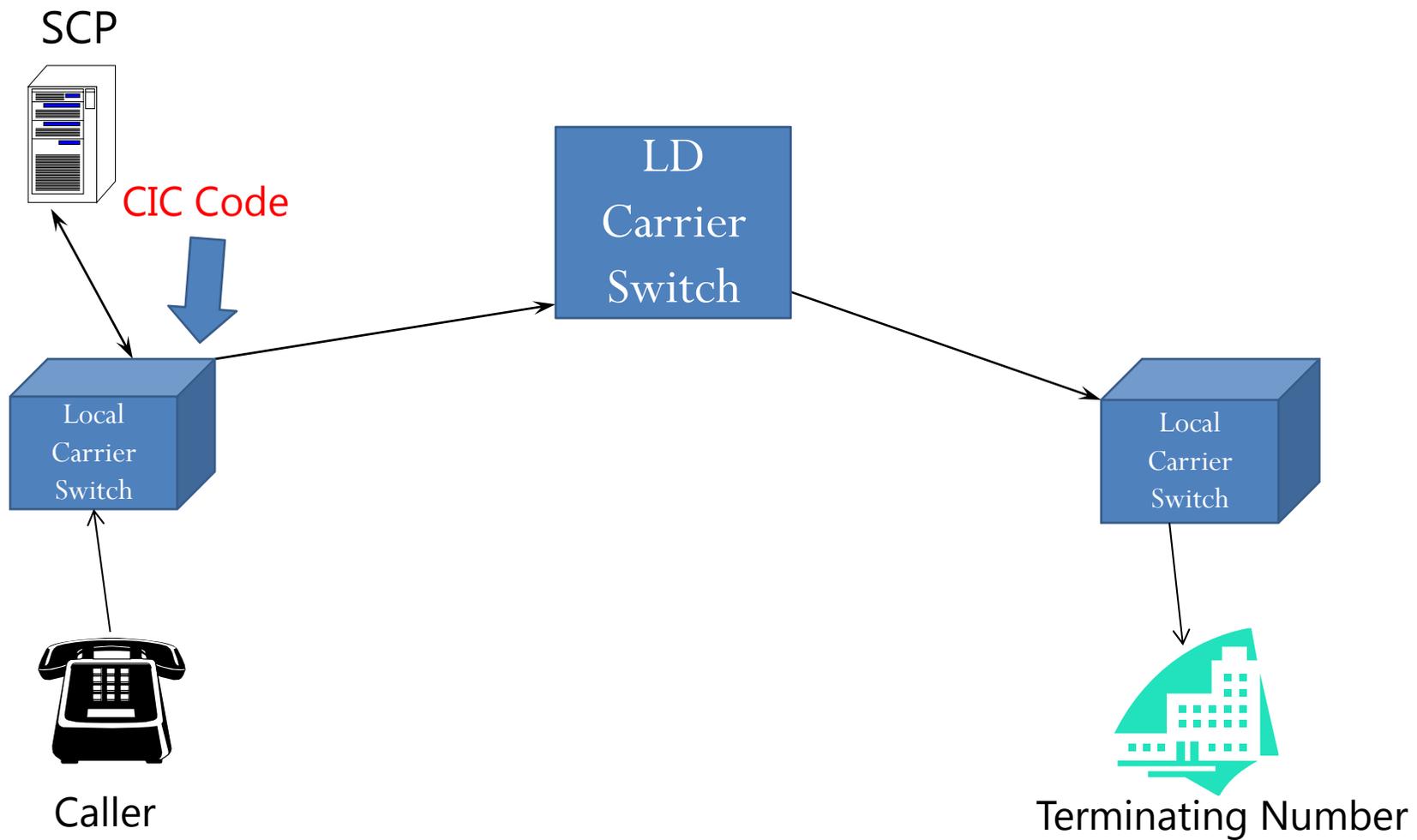
PART 64—MISCELLANEOUS RULES RELATING TO COMMON CARRIERS

Subpart P—Calling Party Telephone Number; Privacy

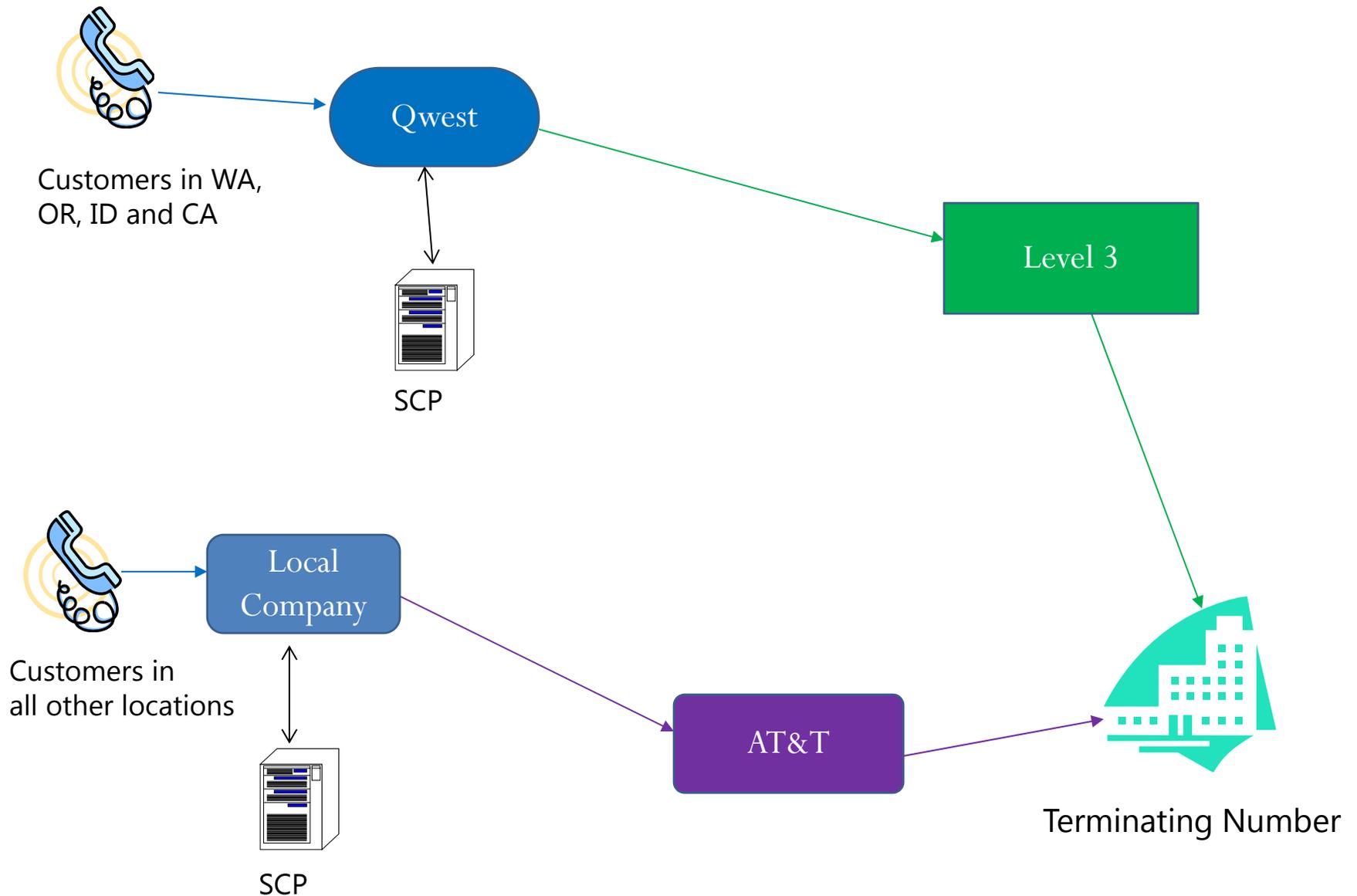
As of October 9, 2012

- (2) Intermediate providers within an interstate or intrastate call path that originates and/or terminates on the PSTN must pass unaltered to subsequent providers in the call path signaling information identifying the telephone number, or billing number, if different, of the calling party that is received with a call. This requirement applies to SS7 information including but not limited to CPN and CN, and also applies to MF signaling information or other signaling information intermediate providers receive with a call. **This requirement also applies to VoIP signaling messages, such as calling party and charge information identifiers contained in Session Initiation Protocol (SIP) header fields, and to equivalent identifying information as used in other VoIP signaling technologies, regardless of the voice call signaling and transmission technology used by the carrier or VoIP provider.**

# How a Toll Free Call Works



# Geographic Routing



# Real World Issues & beyond 800

In the Toll-Free space this issue is known to directly impact:

Poison Control – Calls are routed to the default code on the trunk. For mobility and VoIP customers this can be an impairment to getting help quickly.

LEO Issues – Cannot identify the originating telephone company and ends up misdirected, delaying action.

Improper signaling exists across all call flows though –

Access stimulation, Rural Call Completion (problem identification), commercial settlements and billing, do-not-call list (bypassing) and other robo-dialing.

# Privacy Issues

- Originating carriers express concern that providing location information of callers may violate privacy rules
- With assurance from the FCC that privacy is a non-issue for these calls, originating carriers should be willing to drop requirements for caller consent (opt-in, opt-out).
- The toll-free carrier has access to such a limited window (pinhole view) of location data, it is inappropriate to apply to toll-free carriers the same privacy standard imposed on wireless carriers and their agents (including LBS providers) who provide services predicated on constant, on-going location fixes.
- Both Toll Free Subscribers and those consumers dialing toll free numbers, are disserved when the provision of accurate and timely originating location data becomes subject to unnecessary latency, depletion of call quality or IVR interruption.

# Privacy Concerns

- Title 47: Telecommunication [PART 64—MISCELLANEOUS RULES RELATING TO COMMON CARRIERS](#)  
[Subpart P—Calling Party Telephone Number; Privacy](#)
- **§ 64.1601 Delivery requirements and privacy restrictions.**
- (b) *Privacy*. . . . Carriers must arrange their CPN-based services, and billing practices, in such a manner that when a caller requests that the CPN not be passed, a carrier may not reveal that caller's number or name, nor may the carrier use the number or name to allow the called party to contact the calling party. The terminating carrier must act in accordance with the privacy indicator unless the call is made to a called party that subscribes to an ANI or charge number based service and the call is paid for by the called party.
- Title 47 **47 U.S. Code § 222 - Privacy of customer information**

# Next Step

No new FCC rules or decisions are needed.  
**FCC should contact all carriers of any kind and inform them of the following:**

- Inform the carriers that correct originating information on toll free numbers is required per the attached decision. All carriers at all levels must pass the correct information through the network
- Invite carriers to participate in a committee meetings to select the technical option for complying with the FCC ruling. This committee will be required to bring a recommendation to the FCC within three months
- Order that the selected fix or another option that brings the carrier into compliance must be must implemented within six month

# PARTICIPANTS

- Aelea Christofferson
- Bob Beatty
- Erik Chuss
- Michelle Cohen
- Doug Davis
- Tandy DeCosta
- Keith Fraser
- Chris Gose
- David Greenhaus
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CCI Communications  
800 Response  
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