



Meredith Attwell Baker

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The Honorable Bob Latta, Chairman
The Honorable Jan Schakowsky, Ranking Member
Subcommittee on Digital Commerce and Consumer Protection
Committee on Energy and Commerce
United States House of Representatives
Washington, DC

Dear Chairman Latta and Ranking Member Schakowsky:

CTIA commends the Committee for holding today's hearing to examine the problem of abusive robocalls. CTIA understands consumer annoyance over these calls and we have continued to work actively and in close coordination with Congress, the Federal Communications Commission (FCC), and the Federal Trade Commission (FTC) to address this serious issue on many fronts. Unfortunately, the tactics used by today's malicious spoofers, scammers and other bad actors that generate abusive robocalls have evolved dramatically from when Congress passed the Telephone Consumer Protection Act (TCPA) over twenty-five years ago. Aggressive enforcement of bad actors is key to combatting the scourge of illegal robocalls and we applaud this Committee for its focus on enforcement of illegal robocallers. Tracking down and prosecuting bad actors should be the centerpiece of robocall mitigation efforts. In addition to robust FCC and FTC enforcement efforts, CTIA and its members have implemented a multifaceted approach to robocalls – one that includes a variety of technical solutions and industry initiatives to protect consumers, including development of new applications, new network-based tools, and industry work to deploy call authentication to mitigate caller id spoofing.

Industry Technical Solutions. Industry has been at the forefront of the fight against malicious spoofing and robocalls, having collectively blocked *billions* of robocalls. CTIA and its members continue to innovate new solutions to stop illegal and unwanted robocalls, including by adopting new call blocking and spam call prediction tools for customer use. The application ecosystem around robocall blocking technology has exploded in recent years. In 2016 there were over 85 call-blocking applications available across all platforms, including several offered by carriers to their customers at no charge. CTIA has launched a website devoted to providing consumers instructions on how to stop robocalls, and our website has links to these call blocking applications. Since launch of our website, there are now over 550 applications available, a 495% increase in call blocking, labeling, and identifying applications to fight malicious robocalls.



Wireless Industry Cooperation with Government and Other Stakeholder Initiatives. In addition to technology development, the wireless industry has worked with other stakeholders, including government entities, to reduce abusive robocalls. For example, the industry has implemented recommendations from the October 2016 FCC Strike Force Report, including partnering with standards bodies and accelerating STIR/SHAKEN call authentication development by six months. This technology will give service providers the tools to consistently authenticate, digitally sign, and verify calling party numbers—acting like a digital fingerprint to determine callers are who they say they are. CTIA members also participate in US Telecom's Traceback efforts, and that Working Group is sharing its information with the FCC and FTC to identify the source of illegal robocall traffic. A component of these efforts is preventing false positives to protect communications from legitimate callers. CTIA and its members also assist the FCC and FTC with enforcement actions against robocallers and maintain relationships with call fraud bureaus that may initiate investigations after a suspected mass calling event. CTIA has also created its own Robocall Working Group and provides consumer-facing resources on how to limit and report illegal robocalls.

CTIA Member Actions. CTIA's members have also taken strides to combat malicious robocalls. Many providers, including all of the national wireless carriers, offer robocall abatement options for their customers that are not dependent on the customer first downloading a third-party application. Just some of the efforts of several CTIA members are described below:

- **AT&T** launched *AT&T Call Protect* in December 2016 as a free network service. It can flag suspected spam calls, allowing the customer to choose whether to answer or not, and allowing customers to manually block an unlimited number of specific telephone numbers for thirty-day intervals. In November 2017, AT&T made Call Protect available to its IP Wireline Home Phone Users Network. In addition, AT&T has blocked 3.5 billion unwanted robocalls in cases where its business contracts allow it to block impermissible traffic using a new program that detects violators through network data analysis. Call data analysis and heuristics are powered by Hiya.
- **Sprint** offers *Premium Caller ID service*, which allows users to identify nuisance calls and provides an option to block them. This solution directly leverages data and network intelligence powered by a partnership with Cequent, a wholly owned subsidiary of Transaction Network Services.
- **T-Mobile** launched *Scam ID* in March 2017 as an automatic network-based free service for all postpaid T-Mobile customers and MetroPCS customers. Scam ID identifies calls from known phone scammers and displays "Scam Likely" on the device, giving customers the option to answer or block the number. Customers may also choose to use *Scam Block*, another free service to have calls from known scammers blocked. These solutions are powered by network call data



analysis and heuristics provided by PrivacyStar, and have resulted in more than 3 billion scam calls tagged since launch.

- **Verizon** offers all wireless customers who subscribe to its Caller Name ID service a free feature that identifies potential spam calls and displays the level of risk with a “risk meter.” The service is also powered by Cequent. They also offer a free robocall labeling solution called *Spam Alerts* for all wireline customers with Caller ID. The feature warns customers about robocalls identified by Verizon’s analytics engine and its robocall mitigation team.

These strategies and technologies highlight the wireless industry’s hard work to stay ahead of malicious robocallers, and that work continues. We appreciate this Committee’s efforts to explore ways to further reduce the transmission of illegal robocalls and continue to encourage aggressive enforcement of bad actors. We look forward to continuing to work with you and your colleagues on this important issue.

Regards,

Meredith Attwell Baker
President and CEO