



April 27, 2018

The Honorable Bob Latta
Chairman
Subcommittee on Digital Commerce
and Consumer Protection
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Jan Schakowsky
Ranking Member
Subcommittee on Digital Commerce
and Consumer Protection
2322A Rayburn House Office Building
Washington, DC 20515

Dear Chairman Latta and Ranking Member Schakowsky:

Over the last several years, USTelecom and our member companies have been tremendously focused on the robocall issue, and we share the Subcommittee's concern about the problems associated with phone-based impostor scams targeting consumers. Scammers can use Caller ID spoofing to mask their identity and location, giving their target a false sense of confidence about who is calling. In this ongoing battle against criminal robocallers, there have been four important developments over the last year that are particularly significant.

First, the industry-led, ecosystem-wide Robocall Strike Force issued reports to the Federal Communications Commission (FCC) on October 26, 2016, and April 28, 2017. These reports, taken together, catalogue industry's substantial efforts to advance the battle against illegal robocalls, and hold significant good news for consumers. For example, the reports note that the SHAKEN/STIR standards development for the next generation of robocall mitigation tools that the industry had initiated prior to the Robocall Strike Force, were accelerated by six months. These standards, which incorporate caller-ID authentication capabilities into the network and consumer devices, have entered the industry testing phase, and a Federal Advisory Committee is nearing completion of its recommendation to the FCC on the SHAKEN governance framework. Some of the initial testing of the SHAKEN standard is expected to complete later this year, with potential deployments anticipated later this year and in 2019. The reports also detail the efforts of USTelecom's Industry Traceback Group, which is comprised of a broad range of network providers from the cable, wireline, wireless and wholesale industries, who are working collaboratively in order to identify the origin of these calls at their source. Industry's strong commitment to this effort can be seen its significant growth over the last year, from just 3 carriers in July 2016, to 22 providers as of today.

Second, the reports shows that USTelecom member companies, independent application developers and a growing number of diverse companies offer services today that can help older Americans reduce unknown and potentially fraudulent calls. For example, AT&T has launched its 'Call Protect' service that allows customers with iPhones

and HD Voice enabled Android handsets to automatically block suspected fraudulent calls. Verizon's new Spam Alerts service provides its wireline customers who have Caller ID – whether they are on copper or fiber – with enhanced warnings about calls that meet Verizon's spam criteria by showing the term "SPAM?" before a caller's name on the Caller ID display. Moreover, at a recent joint FCC and FTC robocall workshop, it was noted that since 2016, there has been a 495% increase in smartphone applications alone for addressing robocalls.

Third, the FCC recently adopted rules allowing voice providers to block certain types of calls. USTelecom supported adoption of the rules and participated fully in the proceeding. One issue the FCC raised is what protections legitimate callers should have if their calls are blocked due to the inappropriate scoring of their call. That is an important topic both for situations where voice providers block numbers directly, and for blocking services that consumers may opt into in order to block or filter potentially unwanted calls. It is an issue USTelecom and its members, and other parts of the robocall labeling/scoring ecosystem, have been wrestling with for years, and this past fall we hosted a workshop aimed at helping develop "best practices" for the scoring and labelling of calls. A follow-up workshop is scheduled next month.

We applaud our federal government partners in the robocall fight, who have engaged in a series of enforcement actions against bad actors that have reinvigorated efforts to curb this illegal activity. USTelecom and its industry partners stand ready to further assist in these efforts to bring bad actors to justice. Indeed, the ultimate goal of USTelecom's Industry Traceback Group is to identify the source of the worst of these illegal calls, and enable further enforcement actions by federal agencies. While current civil federal enforcement efforts are laudatory, we believe there is an acute need for coordinated, targeted and aggressive criminal enforcement of illegal robocallers at the federal level. Given the felonious nature of their activities, criminal syndicates engaged in illegal robocalling activity should be identified, targeted and brought to justice through criminal enforcement efforts. While a holistic approach is essential to broadly address the issue of robocalls, robust enforcement efforts targeting illegal robocallers are most effective since they address the activity at the source.

In closing, let me again thank the Committee for holding this timely hearing. We share the Committee's concerns, and we look forward to our continued work together to address this constantly evolving challenge.

Sincerely,

A handwritten signature in black ink, reading "Jonathan Spalter". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Jonathan Spalter
President & CEO