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July 10, 2019

The Hon. Geoffrey Starks  
Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Commissioner Starks:

Thank you for your letter of June 10, 2019, regarding the Federal Communications Commission's most recent efforts to combat the problem of illegal and unwanted robocalls. Sprint shares your goal of protecting consumers and stemming the tide of these disruptive calls.

Sprint has long been active in industry efforts to eradicate illegal and unwanted robocalls. Sprint participated in all four working groups of the FCC's 2016 Robocall Strike Force and co-chaired the "Empowering Consumer Choice" working group. Sprint was a part of the FCC's North American Numbering Council's Call Authentication Trust Anchor Working Group that led to the establishment of the SHAKEN/STIR Governance Authority. As noted in Sprint's November 19, 2018, letter to Chairman Pai, Sprint is fully committed to the implementation of SHAKEN/STIR by the end of 2019.

Sprint has also worked with the industry and third parties to develop other strategies for addressing unwanted robocalls. Sprint has partnered with TNS and its Cequent mobile client subsidiary to develop an application for Sprint wireless customers that provides a robocall labeling and blocking service called Premium Caller ID, which labels incoming robocalls and allows customers to selectively block calls based on risk level. TNS analyzes more than one billion call events per day across 400 carriers to identify nuisance and malicious calls. Premium Caller ID has processed hundreds of millions of calls for millions of Sprint customers and has categorized 222 million calls as being nuisance or malicious, thereby enabling Sprint's customers to block or decline to answer these calls.

Sprint will launch a free version of this call blocking application in the near future for both postpaid and prepaid customers and will promote this service widely to its customers with electronic messaging, website content, and default installation on new devices where feasible.

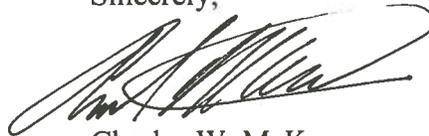
Sprint applauds the Commission's recent action permitting call blocking on an "opt-out" basis. This rule change will give carriers greater flexibility to address the problem of unwanted robocalls. Sprint is investigating how best to implement an "opt-out" strategy given Sprint's current application-based approach to blocking illegal robocalls. Sprint expects application-based call blocking to be more accurate and provide customers greater flexibility and control than network-based approaches. Because some device manufacturers do not permit pre-installation of carrier custom software, however, some customer action may be required to activate and configure even a free anti-robocall application. Sprint continues to investigate additional tools, including network-based solutions, which may provide further protections without proactive customer action.

Implementation of an "opt-out" protocol raises important issues that the Commission will be addressing in its Further Notice of Proposed Rulemaking. For example, Sprint remains concerned that the lack of a safe harbor for accidental or erroneous call blocking could result in significant liability exposure for carriers. The proposed safe harbor for SHAKEN/STIR authentication does not address this issue because SHAKEN/STIR data will likely be only one factor of many in deciding whether a given call is illegal or unwanted. Because it is inevitable that legal calls will occasionally be falsely identified as illegal robocalls, carriers must have some form of liability protection in those circumstances.

In the upcoming comments on the Further Notice of Proposed Rulemaking, Sprint will advocate for a robust safe harbor to ensure that it can provide the robocall solutions that customers demand while not being subject to unknown liability for the occasional error despite good-faith efforts to block only illegal and unwanted robocalls.

Thank you for your continued efforts and attention to this industry wide problem. Sprint remains committed to combating illegal and unwanted robocalls and will work with the FCC and the industry to develop and implement tools to resolve this problem.

Sincerely,



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