



July 9, 2019

Via Electronic Mail

The Honorable Geoffrey Starks
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Commissioner Starks:

On behalf of TDS Telecommunications LLC (“TDS Telecom”), thank you for your letter of June 10, 2019. We share your view that working together, industry and government must work to “protect consumers from deceptive and dangerous robocalls and empower them to be free from disruptive and unwanted calls.”

TDS Telecom, which is headquartered in Madison, Wisconsin, is committed to the highest standards of service for our customers. We provide service to these customers in nearly 900 rural, suburban and metropolitan regions throughout the United States, and we take seriously our commitment to serve these customers reliably, safely and lawfully. Taking action to protect our customers from illegal and unwanted robocalls is a core part of that commitment.

Your letter asks specifically about TDS Telecom’s plans following the Commission’s *Declaratory Ruling* adopted last month, which found that voice service providers may institute call-blocking programs by default, provided that those programs block illegal or unwanted calls through “reasonable analytics” and do not impede certain types of calls from completing (*e.g.*, calls to emergency numbers). While a single solution to eliminate unlawful robocalls in all circumstances remains elusive, we welcome this clarification from the Commission and the additional flexibility it provides.

Since even before the release of the *Declaratory Ruling*, TDS Telecom has been exploring currently available call identification and blocking solutions that it could potentially deploy in its TDM and IP networks to protect our subscribers from unlawful robocalls. TDS Telecom expects that it will bring an analytics-based blocking solution into a test environment in both our TDM and IP networks in August.

In testing, TDS Telecom will evaluate the potential solution’s functionality and effectiveness and throughout testing and beyond will keep top of mind the expectations the Commission articulated in the *Declaratory Ruling*, including:

- The opt-out service should be offered for free, with no line-item charge.
- Providers should use only “reasonable” analytics in default call-blocking programs, requiring us to deepen our understanding of factors appropriately used to identify unwanted calls.

- “Protecting emergency communications is paramount” and thus voice service providers must “make all feasible efforts for [call blocking] tools to avoid blocking emergency calls.”
- Call-blocking programs must not undermine rural call completion.
- Methods to address erroneous blocking for legitimate calls are important. Before implementing, each voice service provider is encouraged to “develop a mechanism for notifying callers that their calls have been blocked.”

We are optimistic that testing will confirm the analytics solution as a meaningful tool in the fight against unlawful robocalls, including as an opt-out service. To be clear, we understand your and other stakeholder perspectives that call blocking technologies like the one under consideration offered on an opt-out basis should not drive a new fee for customers, and we do not intend to apply one.

When we are in a position to launch such a service, we would provide meaningful information to our customers so they can understand the service and make informed decisions as to any opt-out service. The guidance on notifications that was provided in the *Declaratory Ruling* is helpful, and we intend to consider all options, including making information available on the web, through email, and via bill inserts.

In short, we support the expectations and limitations described above and articulated in the *Declaratory Ruling*, and as a result we do not expect to launch a default call-blocking service until it is clear to us that the service will be capable of meeting all of them reliably. We note too that decisions the Commission makes regarding issues raised in the call blocking *Further Notice of Proposed Rulemaking*, including as to a safe harbor, will have a bearing on how providers can best meet the Commission’s expectations. Nevertheless, we share the Commission’s goal of eliminating illegal and unlawful robocalls, and we remain committed to continuing to provide the best possible service experience to our subscribers.

Thank you again for your letter. If we can provide additional information about TDS Telecom’s efforts to eliminate the problem of illegal robocalls, please do not hesitate to let us know.

Respectfully submitted,



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Technologies



Andrew Petersen
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