



T-Mobile USA, Inc.
601 Pennsylvania Avenue, Washington, DC 20004

July 10, 2019

Hon. Geoffrey Starks
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Commissioner Starks:

Thank you for your June 10, 2019 letter to our CEO, John Legere, asking about the call blocking services that T-Mobile USA, Inc. (“T-Mobile”)¹ offers. We wholeheartedly agree with you that wireless providers play a crucial role in providing consumer tools to battle against unwanted and illegal robocalls and are proud of the cutting-edge solutions T-Mobile makes available to its customers for free.

You asked whether we plan to offer call blocking for free, and we are happy to report that we have always offered it for free. As the Un-carrier, T-Mobile has been leading the industry in fighting unwanted and illegal robocalls. More than two years ago, we introduced Scam ID and Scam Block, network-based tools available to all postpaid T-Mobile customers and Metro by T-Mobile customers. Scam ID and Scam Block work automatically on all iOS and Android devices. Because these tools are network-based, customers do not need to do anything to turn them on—there are no apps to download or handset settings to change to access these services. With Scam ID, customers are automatically alerted when an incoming call is likely to be malicious or spoofed by the words “Scam Likely” showing on the caller ID. Customers who do not want scam notifications can turn on Scam Block, and it will block all “Scam Likely” calls so that they never reach their handsets. Customers can toggle Scam Block on by simply dialing #662# and can turn it off by dialing #632#. With the free Name ID app, customers can check their call logs to see what calls have been blocked.

T-Mobile’s scam-fighting tools are updated every six minutes through machine learning and artificial intelligence that looks at the behavior of a call—a capability not available through applications. T-Mobile was the first to adopt this network-based approach specifically because network solutions provide real-time decisions on incoming calls, intelligent analysis of phone call and network-wide data, and an adaptable machine-learning based framework to stop the next scammer tactic.²

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

² Comments of First Orion Corp., CG Docket No. 17-59, at 2-3 (filed Sept. 24, 2018).

These steps have helped protect T-Mobile customers on a scale that dwarfs other carriers—we alert customers to an average of 1 billion “Scam Likely” calls per month and as of this month, have identified 15 billion “Scam Likely” calls. In the two years since Scam ID launched, we have blocked 3.2 billion calls with Scam Block.

And while scam robocalls are annoying and, in some cases, dangerous to our customers, it is important to note that not all robocalls are bad. A robocall confirming a doctor’s appointment, for instance, is one that consumers likely want to receive. That is why T-Mobile offers the Name ID application for customers who want even more control over their calls. Name ID allows customers to directly manage entire categories of robocalls; they can choose whether they want to send “Telemarketing calls,” “Political calls,” “Nuisance calls,” “Survey calls,” “Charity calls,” “Informational calls,” or “Prison/Jail calls” straight to voicemail. It also allows them to manage personal phone number block lists at the network level so that blocked numbers stay blocked even when customers switch to a new device. Name ID also includes reverse number lookup. Name ID is included for free in all Magenta Plus and T-Mobile ONE Plus plans and is just \$4/line/month for other T-Mobile customers. Name ID is pre-loaded on every new Android device (and expected to be available for pre-loading on iOS devices in the coming months) so that customers can try it out for 30 days for free and then decide whether to sign-up. Customers can learn more about Scam ID, Scam Block, and Name ID at <https://www.t-mobile.com/resources/call-protection>.

In addition to developing its own suite of consumer tools, T-Mobile was the first carrier to announce readiness for the FCC-recommended STIR/SHAKEN standards in November 2018 and first to implement “Caller Verified” in January 2019 on its network. We were also first in the industry to launch STIR/SHAKEN across networks with Comcast Xfinity in April 2019. We now have Caller Verified on 10+ devices with more to come in 2019.

As your letter notes, the Commission has taken an important step to help address issues related to carriers’ ability to block robocalls.³ First, its *Declaratory Ruling* has clarified that the Commission’s rules do not prevent carriers from blocking unwanted robocalls. This clarification resolves an important legal question that will have positive, lasting ramifications upon carriers’ abilities to deploy new tools and techniques to combat robocalling. Second, the *Third Further Notice of Proposed Rulemaking* proposes the establishment of a carrier safe harbor from liability for call blocking, an important precursor to the establishment of an opt-out regime. In the meantime, we are proud of being the industry leader in providing scam identification and

³ *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, FCC 19-51 (rel. June 7, 2019).

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blocking for free on a default basis and look forward to continuing to work with you and the Commission in the fight to protect American consumers against unwanted robocalls.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen O'Brien Ham". The signature is written in a cursive style with a large, stylized "B" in the middle.

Kathleen O'Brien Ham,
Senior Vice President, Government Affairs

cc: William Davenport
Michael Scurato