



1300 I Street, NW
Suite 500 East
Washington, DC 20005
202.515.2533
kathleen.m.grillo@verizon.com

Kathleen Grillo
Senior Vice President
Public Policy & Government Affairs

July 10, 2019

The Honorable Geoffrey Starks
Commissioner
Federal Communications Commission
Washington, D.C. 20554

Dear Commissioner Starks:

Thank you for your recent letter to Verizon CEO Hans Vestberg about our commitment to use free blocking tools to protect our customers from unwanted robocalls. Verizon well knows our consumers are fed up with being bombarded by spam robocalls, and they deserve every protection available. We agree that robust, large-scale call blocking, as allowed by the Commission's November 2017 and June 2019 declaratory orders,¹ is an important part of the solution. And we are committed to continuing to improve the free blocking we offer our customers. This will include taking advantage of the additional flexibility that the Commission recently granted. Winning the war on robocalls also requires both industry at large and the Commission to take additional steps to restore trust in Caller ID and to more aggressively track down illegal spammers along with the complicit service providers that accept their traffic.

One of the pillars of Verizon's commitment to protect customers from unwanted robocalls is providing blocking for our customers that is effective, convenient, broadly deployed, and free. For example, we recently incorporated into our "Call Filter" service the results of the caller ID verification that we can do for calls enabled with the STIR/SHAKEN authentication technology. That allows us to make better decisions about whether to block or label a call as spam. We are actively working on ways to take advantage of the Commission's most recent order to more broadly make call blocking available to our customers. I can confirm that we have no intention of starting to charge customers for blocking. And as Verizon continues to expand and improve our customers' blocking experiences, we will ensure customers are informed about what opt-in or opt-out blocking we do on their behalf so that they are empowered to modify or remove the blocking service.

While free blocking tools will help fight the robocall plague, the war on robocalls must be fought on multiple other fronts. Verizon's multi-pronged strategy for insulating our customers from robocalls includes:

¹ See Report and Order and Further Notice of Proposed Rulemaking, CG Docket No. 17-59 (Nov. 17, 2017) & Declaratory Ruling and Third Notice of Proposed Rulemaking, CG Docket No. 17-59 (Jun. 7, 2019).

- Because restoring trust in Caller ID is crucial for the overall mission of restoring trust in voice calls, Verizon is a leader in deploying STIR/SHAKEN. That technology allows service providers to verify the accuracy of the calling party number received with a call. Not only is Verizon expending substantial resources to implement STIR/SHAKEN in our own networks, but we are supporting efforts to help the entire industry adopt STIR/SHAKEN. For example, Chris Oatway on my team is on the board of the industry-led governance authority that is establishing a system for issuing to service providers the certificates needed to efficiently send and receive STIR/SHAKEN-enabled calls.
- Verizon is a founding member of the USTelecom Industry Traceback Group, an industry-led organization that traces back suspicious robocall traffic and staunches many illegal robocalls at their origins.² And because many tracebacks were hindered when a service provider refused to identify the upstream carrier that sent it suspicious traffic, Verizon took unprecedented action to press service providers throughout the ecosystem to participate in tracebacks. We now require our wholesale customers to sign a non-negotiable amendment to their contracts requiring them not only to participate themselves in tracebacks, but also to require *their* wholesale customers (and their customers' customers, etc) to sign similar amendments to their contracts. That action has helped push traceback obligations throughout the call path and across the ecosystem, and has increased USTelecom's ability to trace illegal robocalls all the way to the providers that originate the illegal traffic.
- Verizon has implemented programs to monitor how our services are used by our customers to prevent them from being used by illegal robocallers.³ We encourage other voice service providers to implement similar programs and have encouraged the Commission to take action against providers that do not implement appropriate practices both to trace back illegal traffic and to avoid originating it in the first place. This is important because some service providers appear to be willing to look the other way when serving robocall customers whose traffic appears to be illegal.

² This Commission and the Federal Trade Commission have acknowledged USTelecom's work addressing the robocall problem. See FTC, Law Enforcement Partners Announce New Crackdown on Illegal Robocalls (June 25, 2019) (available at https://www.ftc.gov/news-events/press-releases/2019/06/ftc-law-enforcement-partners-announce-new-crackdown-illegal?utm_source=slider); Letter from Ajit V. Pai, FCC, to Jonathan Spalter, USTelecom (Nov. 6, 2018), (available at <https://docs.fcc.gov/public/attachments/DOC-354942A2.pdf>).

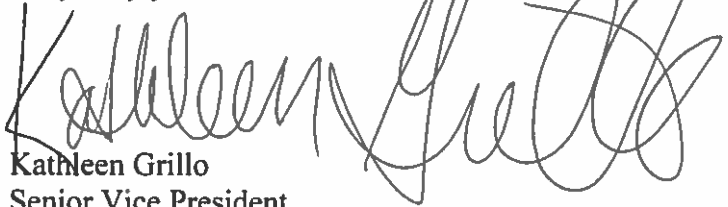
³ See Verizon's Comments on Public Notice, CG Docket No. 17-59 (July 20, 2018), Section II-C.

The Honorable Geoffrey Starks
July 10, 2019
Page 3 of 3

- Verizon supports federal legislation to mandate STIR/SHAKEN, as well as to close the loophole in the Truth in Caller ID Act that results in very few robocallers being charged with illegal spoofing. Currently, the Act requires the government to prove that the caller intended to commit fraud, cause harm, or illegally obtain something of value—a high evidentiary burden that represents a bar to effective enforcement. Verizon thus supports a simple rule that would make it illegal for any caller to use any phone number that it is not authorized to use.

The components needed to provide consumers with meaningful protections from robocalls—including blocking tools, call authentication technology, and an effective industry traceback mechanism—exist today. Industry and the Commission have the opportunity to collectively work together to address the problem on every front, including by rooting out the bad actors that continue to spam our customers with impunity. We look forward to continuing to work with you to make that happen.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Kathleen Grillo', written over a horizontal line.

Kathleen Grillo
Senior Vice President
Verizon