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July 10, 2019

The Honorable Geoffrey Starks  
Commissioner  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Dear Commissioner Starks:

On behalf of AT&T,<sup>1</sup> I write in response to your June 10, 2019 letter to John Donovan, CEO of AT&T Communications, inquiring about AT&T's plans for providing opt-out call blocking tools to our customers. AT&T is a leader in the industry fight against illegal and unwanted robocalls. AT&T was the first voice provider to offer a branded, in-network call blocking and labeling tool—AT&T Call Protect—at no charge to customers. Nearly three years later, AT&T Call Protect is now a suite of services, ranging from a labeling-only tool to options that offer blocking and labeling, among other features. Through the AT&T Call Protect suite, AT&T has blocked or labeled nearly 600 million suspected fraud calls and more than 1.4 billion suspected spam calls since late 2016, all in addition to more than *5 billion* suspected illegal calls blocked by our global fraud team.

AT&T's efforts to combat illegal and unwanted robocalls are not limited to call blocking and labeling. Far from it. AT&T actively seeks to root out suspected illegal robocalls at their source as a founding member of USTelecom's Industry Traceback Group, through which we regularly identify and investigate suspected high-volume robocall operations to refer to federal and state law enforcement.<sup>2</sup> AT&T also is a leader in the deployment of the SHAKEN/STIR

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<sup>1</sup> AT&T Services, Inc. files this letter on behalf of its wireless and wireline operating affiliates (collectively, "AT&T").

<sup>2</sup> The Federal Trade Commission recently recognized USTelecom's assistance in a robocall-related case brought against a Florida man, who is alleged to have sent more than 57 million illegal robocalls. *See* Press Release, FTC, FTC, Law Enforcement Partners Announce New Crackdown

protocols. AT&T helped to develop the standards, played an active role on the NANC working group that established the governance framework for industry implementation, currently chairs the Governance Authority Board that recently selected the SHAKEN Policy Administrator, and is deploying the standards in its network this year—ahead of broader industry implementation and consistent with Chairman Pai’s stated expectations.

Notwithstanding these and other significant and ongoing efforts, AT&T recognizes that illegal and unwanted calls remain a serious and growing public concern. All stakeholders—industry, regulators, and law enforcement—must work together and do more. We therefore welcomed the Commission’s recent clarification that AT&T may now offer call-blocking tools on an informed, opt-out basis.<sup>3</sup> Consistent with that ruling, AT&T is expanding AT&T Call Protect to provide automatic blocking of suspected fraud calls on an opt-out basis, at no charge, to new AT&T Mobility customers.<sup>4</sup> While it is premature to announce additional details, AT&T also is developing plans to provision call-blocking and labeling tools to even more of our customers in the coming months, also at no charge. Customers will be notified via text message when automatic fraud blocking is added to their service. Likewise, we plan to continue to invest in customer education, recognizing that it is an important part of these efforts. In addition to SMS messages to AT&T Mobility customers, AT&T already makes relevant information available using multiple channels, including AT&T’s website, [www.att.com](http://www.att.com), and bill messages. AT&T expects to continue to use such channels, and potentially others, as part of our current and future customer education efforts regarding available tools to combat robocalls.

AT&T welcomes and appreciates the Commission’s ongoing cooperation and collaboration with industry to provide relief to consumers from the scourge of illegal robocalls. AT&T is committed to the effort, and we look forward to continuing to work with you toward that goal.

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on Illegal Robocalls (June 25, 2019), [https://www.ftc.gov/news-events/press-releases/2019/06/ftc-law-enforcement-partners-announce-new-crackdown-illegal?utm\\_source=slider](https://www.ftc.gov/news-events/press-releases/2019/06/ftc-law-enforcement-partners-announce-new-crackdown-illegal?utm_source=slider).

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

<sup>4</sup> *See* Press Release, AT&T, Automatic Blocking of Fraud Calls Coming to Millions of AT&T Customers (July 9, 2019), [https://about.att.com/story/2019/att\\_call\\_protect.html](https://about.att.com/story/2019/att_call_protect.html). The newly expanded service also includes labeling of suspected spam calls and is available to postpaid wireless customers with eligible service and a compatible device. Additional details are available at [www.att.com/callprotect](http://www.att.com/callprotect).

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'JM', with a long horizontal line extending to the right.

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Joan Marsh  
Executive Vice President  
Regulatory & State External Affairs  
AT&T Communications

cc (via email): The Honorable Ajit Pai  
The Honorable Michael O'Rielly  
The Honorable Jessica Rosenworcel  
The Honorable Brendan Carr