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July 10, 2019

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

Dear Commissioner Starks:

Thank you for your June 10 letter to CEO Jeff Storey with questions about robocall blocking plans. We share your concern about illegal robocalls and their associated annoyance and fraud.

CenturyLink welcomed the Commission's June 6, 2019 Declaratory Ruling and appreciated your support for the measure.¹ The ruling finds that voice service providers may, under existing law, provide call blocking services on an informed opt-out basis. The robocall problem is complex, and illegal robocallers adapt quickly, so service providers need every tool at their disposal. The Commission's ruling allows additional flexibility so providers can deliver more options to help consumers manage and filter the calls they receive.

CenturyLink is committed to doing its part in helping curb illegal robocalls. Our company helped develop the technical industry standards for the SHAKEN/STIR through the Alliance for Telecommunications Industry Solutions, and we are implementing this technology in our IP network. CenturyLink was among the founders of the Industry Traceback Group ("ITG"), which enables prompt and accurate tracking of illegal calls all the way to their origins. The Federal Trade Commission recently acknowledged the ITG's key support in enabling the shutdown of a large scale illegal robocalling operation.

CenturyLink also continually analyzes traffic to spot mass calling events, it coordinates with other providers' fraud departments, and it blocks invalid numbers and identified illegal robocalls at the network level. With several other major providers, it has expanded the Commission's original Do Not Originate trial to cover a wider range of telephone numbers associated with agency impersonation scams. CenturyLink also promptly blocks Direct Inward Dialing numbers used by robocalling scammers for their call-back numbers. These industry measures have helped reduce the number of IRS scam calls by roughly 85%. Working together, service providers and state and federal authorities can help reduce the problem of illegal robocalls.

¹ *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, FCC 19-51 (rel. June 7, 2019) (Declaratory Ruling).

Opt-out call blocking service plans.

CenturyLink offers opt-in blocking and filtering tools and has additional opt-in service under review, for both residential and business customers. The company is evaluating the potential for default blocking for consumers beyond its current blocking of known illegal calls, but it has not yet announced any decision about opt-out service. Although some “blacklist” products have an established record, data analytics technology remains in its earliest stages and also awaits the completion of SHAKEN/STIR’s roll-out. CenturyLink will evaluate opt-out call blocking options based on suitability for the customer, testing and real-world reliability and accuracy, cost, and legal and regulatory developments.

Informing customers about opt-out blocking services.

The Declaratory Ruling did a good job identifying how providers may notify customers about opt-out service options.² As a general matter, CenturyLink notifies mass market customers about new services through any combination of bill inserts, bill messages, or (where authorized) electronic or direct mail. Enterprise, business, government, or wholesale customers may also be contacted by their account representatives. All of these methods can be expected to refer customers to the CenturyLink Customer Care telephone centers and to CenturyLink’s website for more detailed information. If a decision is made to adopt opt-out call blocking services, we would expect to use a combination of these techniques to inform our customers. The FCC could help by expanding its consumer education efforts to cover call blocking services.

Charges for opt-out call blocking services.

It is not in the public interest to preclude the use of line-item charges for blocking services. The Commission should seek to encourage industry and third party vendor innovation and ultimately to promote a wider range of consumer choices where the network can support them. Some customers, notably businesses, may value options differently than others. Historically, CenturyLink’s traditional opt-in blocking and filtering features have been available at no extra cost to bundled service customers, who represent the large majority of our customers. Outside of bundled service, basic local telephone service customers may incur a modest monthly fee for those features.

Why default opt-out blocking is not currently offered.

CenturyLink currently applies blocking at the network level, based on a variety of reliable indicators of caller misuse. It is continuing to expand that capability and expects to have more sophisticated capabilities available in the future, based in part on data analytics and SHAKEN/STIR. Although the new technologies of data analytics show promise, CenturyLink engineers have not yet identified a vendor solution sufficiently reliable and accurate to impose on consumers on an opt-out basis. Where such blocking products are offered today, CenturyLink believes they are more appropriately offered on an opt-in basis.

All voice service providers need to be sensitive to the hazards of over-blocking as not all robocalls are illegal. Industry estimates suggest half of all robocalls are legitimate, which is one reason why blocking only illegal calls accurately is difficult. Many calls cannot be authenticated at origination or received with certification at termination, particularly where legacy TDM networks are involved. While the lack of authentication will help providers identify and appropriately screen some unlawful

² Declaratory Ruling at ¶ 33.

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calls, it cannot be the exclusive basis for blocking calls. Otherwise, far too many legitimate calls will be blocked through “false positives,” frustrating callers and called parties alike. Given the risks of inadvertent blocking, a liability “safe harbor” is also important.

CenturyLink strives to offer reliable, high quality service that its customers can trust. We remain committed to fighting illegal robocalls, and welcome the Commission’s support as our industry continues to innovate and develop new ways to help reduce illegal robocalls.

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Please contact us if you have further questions about CenturyLink’s and the industry’s continuing efforts to help protect consumers from illegal robocalls.

Sincerely,

A handwritten signature in black ink, appearing to be 'C. Starks', written in a cursive style.