

July 10, 2019

The Honorable Geoffrey Starks  
Commissioner  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
[Geoffrey.Starks@fcc.gov](mailto:Geoffrey.Starks@fcc.gov)

Dear Commissioner Starks:

Thank you for your letter about Charter's continued efforts to empower our customers and protect them against illegal and unwanted robocalls. As one of the largest residential voice providers in the US, we are very concerned about the impact of these calls on our customers, and we appreciate the Commission's and your leadership on this important issue. We value the Commission's recognition that industry collaboration fostered by regulatory flexibility is essential for providers to effectively stop robocalls and therefore appreciate the Commission's recent clarification that default call blocking is one of the tools available for protecting consumers.

Charter understands that unwanted robocalls can be a security threat as well as an annoyance. Part of our commitment to delivering a superior customer experience includes giving our customers tools to avoid them. To that end, we are implementing the Signature-based Handling of Asserted Information using toKENs framework and procedures and Secure Telephone Identity Revisited protocol (together, "SHAKEN/STIR"), throughout our residential voice footprint. Rolling out SHAKEN/STIR is a top priority for Charter, and we have committed to the Commission that we will be able to sign and verify calls on our network by the end of this year.<sup>1</sup> We also support the adoption of rules that would permit providers to block calls that fail authentication where both the originating and terminating provider have implemented the SHAKEN/STIR framework and the terminating provider has implemented analytics to help validate calls. For our wireless product, we are an MVNO on the Verizon cellular nationwide network, and therefore, dependent on Verizon's implementation of SHAKEN/STIR this year. However, in addition to Verizon's network-level implementation, we are also considering offering our mobile customers a free mobile application that would provide them with additional robocall prevention on their devices.

As the Commission explained in its recent clarification ruling, "rigid blocking rules" could be counterproductive, stifling innovation and enabling bad actors to more easily evade consumer protections.<sup>2</sup> Instead, the Commission emphasized the importance of "flexibility" and "a diversity of approaches" to

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<sup>1</sup> Charter, Using Technology to Stop Robocalls and Protect Consumers (May 2, 2019), <https://policy.charter.com/blog/using-technology-stop-robocalls-protect-consumers/>.

<sup>2</sup> *In re 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 ¶ 34 (June 7, 2019).

stopping illegal and unwanted calls.<sup>3</sup> The Commission's recent clarification rightly encourages industry to continuously strive to address new problems efficiently and to innovate in an ever-shifting landscape.

In this regard, we already offer tools that enable our customers to block anonymous calls and robocalls, and we are developing tools that will also block Do Not Originate calls. We are also evaluating ways to deploy default call blocking with a customer opt-out capability across our residential voice network, and we anticipate that we will be able to deploy this solution without additional charge to our customers within the next 18 months. Such a solution will leverage our anticipated deployment of SHAKEN/STIR with enhanced call analytics to enable Charter to offer a better voice service in which the customer decides what calls to accept and what services to receive. To support our default call blocking initiative, Charter estimates that it will have implemented advanced call analytics by the second quarter of 2020.

In general, our approach is to give customers choice and flexibility to choose the products and services that best meet their individual needs. Charter is committed to providing customers with the information they need to make the best decisions for themselves, their families and their businesses. Accordingly, we plan to accompany the rollout of a default call blocking service with marketing and customer education to help customers understand how the service works and how to opt out if they so choose. This may include targeted messages to unique customer segments (such as small businesses and residential customers), an outline of how default call blocking would enhance the consumer experience, an explanation of any limitations of the default call blocking, and clear instructions on how to manage the service (such as turning the call blocking on and off). We may use a variety of channels for communicating this information, such as email, messages on bill statements, or messages through online customer portals.

Charter is dedicated to continuing its proactive engagement with the Commission and our customers on this issue. We agree with the conclusion of the Robocall Strike Force, in which we participated, that consumer choice is critical to effectively managing illegal and unwanted robocalls.<sup>4</sup> Charter also participates in the Industry Traceback Group to address illegal robocalls. In addition to rolling out the SHAKEN/STIR framework, Charter already offers its customers a broad range of tools for call blocking, screening, and identification, all of which are free to subscribers:

- *Accept Selected Callers:* Spectrum Voice subscribers have the ability to receive calls only from numbers they specify. Callers from phone numbers not contained on a pre-approved list will hear a polite message stating that calls are not being accepted at this time.
- *Block Anonymous Calls:* Spectrum Voice subscribers have the ability to block incoming calls that are presented without Caller ID information. Anonymous callers will hear a message stating that anonymous and private calls are not being accepted and instructing the caller to enable Caller ID before calling again.
- *Block Unwanted Callers:* Spectrum Voice subscribers may create a list of numbers that will be blocked from ringing through to the user; such callers will hear a message stating that the customer is not accepting calls.

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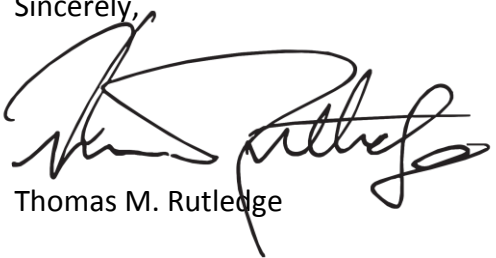
<sup>3</sup> *Id.*

<sup>4</sup> *Industry Robocall Strike Force Report* at 10-11 (Apr. 28, 2017), <https://www.fcc.gov/file/12311/download>.

- *Screen Calls With Caller ID:* Spectrum Voice subscribers enjoy a Caller ID service that displays the incoming caller's phone number and name (if available), including when a subscriber is already on the phone. The subscriber can view the caller's information and determine whether or not to answer. This service is also available on Spectrum Voice customers' television screens.
- *Nomorobo:* Nomorobo screens a Spectrum Voice subscriber's incoming calls against a database of blacklisted numbers as well as an extensive "whitelist" of emergency services. If a call is flagged for potential blocking, the caller must enter a 2-digit key; otherwise, the call is not connected. Charter enables customers to activate Nomorobo with a simple "1-click" solution via the customer's voice feature management portal. Charter has enabled and integrated Nomorobo across all of its legacy networks (Bright House, Time Warner Cable, and Charter).

Charter views combatting robocalls as a business priority and part of our commitment to our customers. We look forward to continuing our proactive efforts to empower and protect consumers, and we stand ready to support the Commission as it continues to work on tackling unwanted and illegal robocalls.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas M. Rutledge". The signature is fluid and cursive, with a large initial "T" and "R".

Thomas M. Rutledge