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July 10, 2019

Commissioner Geoffrey Starks
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Re: *Call Authentication Trust Anchor*, WC Docket 17-97
Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket 17-59

Dear Commissioner Starks:

In response to your letter to Pat Esser, president of Cox Communications, Inc. (Cox), dated June 10, 2019, Cox is pleased to provide the following information.

Cox applauds the Commission's efforts to combat unwanted robocalls with its adoption of a *Declaratory Ruling and Third Further Notice of Proposed Rulemaking*¹. Cox is evaluating the *Order and FNRPM* to determine additional measures the company may take to limit unwanted robocalls, which will build on the work Cox already has underway in this area.

As detailed in letters to Chairman Ajit Pai in November 2018² and Commissioner Jessica Rosenworcel in January 2019³, Cox explained that it has been actively involved for several years in the efforts across various industry standards fora to develop the SHAKEN/STIR framework. Moreover, Cox detailed its commitment to implementing a robust call authentication framework for its residential customers in 2019. This remains true today.

¹ *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 (June 7, 2019) (Order and FNPRM).

² Letter from Jennifer Hightower, Cox Communications, to Chairman Ajit Pai, FCC, WC Docket 17-97 (filed November 19, 2018).

³ Letter from Jennifer Hightower, Cox Communications, to Commissioner Jessica Rosenworcel, WC Docket 17-97, GC Docket 17-59 (filed January 14, 2019).

In the meantime, as industry continues its work on the deployment of SHAKEN/STIR and as Cox continues its current transition of its residential customer base to a new IP Multimedia Subsystem (IMS) platform, Cox is rolling out free access to Nomorobo. The Nomorobo service should be available to the vast majority of Cox's residential customers throughout 2019.

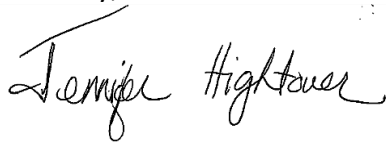
In addition, Cox continues to provide other call blocking features for its customers, such as Anonymous Call Rejection, which allows customers to reject calls from callers who block their Caller ID from displaying, and Selective Call Rejection, which allows customers to create a personal "blacklist" of telephone numbers that will be blocked or rejected. Both are standard features included with Cox's currently marketed voice bundles.

Cox also blocks inbound calls purportedly originating from 10-digit numbers that are not valid NANP numbers as authorized by the FCC's 2017 Call Blocking Order.⁴

Furthermore, Cox participates in two initiatives that were developed as part of the FCC's Robocall Strike Force effort – the "Do Not Originate" (DNO) process, in which the Cox voice network actively identifies and blocks calls displaying DNO telephone numbers; and the U.S. Telecom Traceback Group, which helps to identify persons who make illegal robocalls with the intention of assisting law enforcement in identifying and prosecuting (and therefore ceasing) bad actors using illegal spoofing to commit fraud.

Cox supports the Commission's ongoing efforts to stop unwanted and illegal robocalls that are an unacceptable nuisance, and which present a threat for consumers, businesses and service providers. We look forward to continuing to work with you to solve this problem for the benefit of consumers.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Hightower". The signature is written in a cursive style with a large initial "J".

Jennifer Hightower
Senior Vice President and General Counsel
Cox Communications

⁴ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, GC Docket No. 17-59, Report and Order and Further Notice of Proposed Rulemaking (November 17, 2017) at para 19.