



Daniel McCarthy
President and CEO
401 Merritt 7
Norwalk, CT 06851

July 10, 2019

VIA EMAIL

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

Dear Commissioner Starks,

Thank you for your June 10, 2019 letter. Frontier applauds the Commission's continued leadership on reducing robocalls and dedication to making additional tools available to fight bad actors placing these unwanted calls. We also welcome the Commission's June 6, 2019 Declaratory Ruling finding that we may deploy call blocking services by default on an informed opt-out basis. Given the complexity of the robocall problem and the speed at which illegal robocallers adapt to circumvent detection technology, carriers need every weapon in their arsenal to fight this scourge.

Frontier is dedicated to continuing the fight against illegal robocalls. We actively participate in the Industry Traceback Group, coordinated through USTelecom, and work with other providers to identify sources of unlawfully spoofed calls and refer suspected fraud to the FCC and FTC for enforcement actions. In a November 6, 2018 letter to USTelecom, these efforts were lauded by the Commission as "invaluable" and "exactly the kind of industry/government cooperation necessary" to combat illegal robocalling and harmful spoofing. The FTC similarly recently acknowledged that the Industry Traceback Group helped enable the shutdown of a large scale illegal robocalling operation. Frontier also participates in the FCC's Do-Not-Originate initiative and blocks calls from numbers on the list. And we have committed to implementing the SHAKEN/STIR protocol on our IP network by the end of this year.

To your questions in your letter, Frontier continues to evaluate whether we can feasibly offer default call blocking services on an informed opt-out basis. As you are aware, technological considerations are a critical factor in our ability to stop robocalls, and the tools we offer our customers and deploy on our network depend on the network technology. For instance, we currently offer the award-winning "Nomorobo" service for customers who subscribe to VoIP service (Nomorobo is incompatible with TDM). Likewise, Frontier offers anonymous call rejection, selective call rejection, and selective call acceptance to its TDM and VoIP customers. We are continuing to work on other consumer tools and network blocking. Frontier is still evaluating whether to provide these consumer tools on an opt-out basis given that the technology is far from perfect. Indeed, customer call blocking tools, such as Nomorobo and

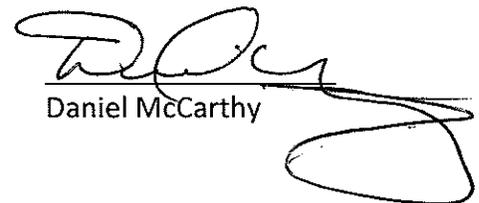
anonymous call rejection, have a higher risk for erroneous blocking than network blocking, which typically comes from the FCC's Do-Not-Originate list. Consequently, Frontier is concerned about blocking legitimate calls without customers affirmatively accepting that risk by opting in to the service. Frontier will continue to evaluate whether opt-out call blocking is the right path for its customers as existing technologies evolve and new technologies develop.

As to how Frontier informs its customers about its robocall blocking tools, Frontier publicizes all of its robocall efforts and tools on its website, and our representatives regularly provide customers with robocall blocking tips and information. As we continue to evaluate the possibility of providing tools on an opt-out basis, we will certainly publicize this information on our website should we decide employing opt-out call blocking is in the best interest of our customers.

In all our efforts in the fight against robocalls, Frontier remains committed to providing its customers with the best experience, and we currently offer all of our call-blocking technology for free to customers, including Nomorobo and other call blocking options. We do not anticipate that opt-out call-blocking services would be treated any differently, and we will continue to evaluate all options to provide the best calling services.

We look forward to working with the Commission and all stakeholders to continue the critical work of protecting consumers. Please do not hesitate to contact us if you would like to discuss these important issues further.

Sincerely,



Daniel McCarthy