

**STATEMENT OF  
ACTING CHAIRWOMAN JESSICA ROSENWORCEL**

Re: *In the Matter of Implementation of the Middle Class Tax Relief and Job Creation Act of 2012; Establishment of a Public Safety Answering Point Do-Not-Call Registry; Enhancing Security of Public Safety Answering Point Communications*, CG Docket No. 12-129, PS Docket No. 21-343.

Robocalls that interrupt your family dinner are annoying. But robocalls that get in the way of your ability to call 911—that’s a whole other level—because they could be fatal.

Recognizing this, Congress directed the FCC to adopt rules to establish a special Do-Not-Call Registry for the telephone numbers used at our nation’s 911 call centers. Here’s how the idea would work: We would create a list of telephone numbers of public safety answering points across the country and anyone using automatic calling systems, including telemarketers, would have to check this list before dialing to make sure that they wouldn’t interfere with public safety.

This is a good idea in theory. But in practice it has some problems. Because once you’ve put all of those numbers in one place, how do you make sure the list stays secure? A bad actor with access to the list could flood a 911 call center with automatically-dialed robocalls and cut off access to essential public safety systems. In other words, in an effort to eliminate the threat of autodialed robocalls to public safety answering points could we inadvertently create a new security threat?

That brings us to right now. Because instead of creating the special Do-Not-Call Registry for 911 call centers as originally planned, we have a better idea: Why not have voice call providers block these robocalls so they never reach our nation’s public safety answering points in the first place? Think about it. It limits access to the registry to a verified list of voice providers—and a smaller group means we can more effectively develop safeguards to protect it.

We believe this is a promising approach, but we want to get this right. So in this rulemaking we’re asking how can we improve it? Are there other solutions we should consider? And what other security threats do we need to address?

A big thank you to our partners at the Federal Trade Commission, in the public safety community, and across industry who helped us identify these security concerns and think creatively about how to fix them. I also want to thank Bob Aldrich, Jerusha Burnett, Aaron Garza, Rebecca Maccaroni, Erica McMahon, Karen Schroeder, David Sieradzki, Richard Smith, Mark Stone, Kristi Thornton, and Patrick Webre from the Consumer and Governmental Affairs Bureau; Kenneth Carlberg, David Furth, Ryan Hedgpeth, Nikki McGinnis, Erika Olsen, and Austin Randazzo from the Public Safety and Homeland Security Bureau; Matthew Collins and Dan Kahn from the Wireline Competition Bureau; Valerie Hill, Rick Mallen, and Bill Richardson from the Office of General Counsel; Mary Romano, Kristi Thompson, and Lisa Zaina from the Enforcement Bureau; Virginia Metallo and Emily Talaga from the Office of Economics and Analytics; and Tadele Shiferaw from the Office of the Managing Director.