

**STATEMENT OF
COMMISSIONER GEOFFREY STARKS**

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59; *Call Authentication Trust Anchor*, WC Docket No. 17-97; Report and Order, Order on Reconsideration, Order, and Further Notice of Proposed Rulemaking (May 19, 2022)

Our battle against illegal and unwanted robocalls continues. Robocalls continue to be the biggest source of complaints the Commission receives. So far this year, the Commission has received 43,800 robocall complaints. Now is not the time to take our foot off the gas, because according to YouMail, there were 3.9 billion robocalls placed last month.¹ This is far too many, but a positive sign is the number is trending downward from last year. Thus, while we have taken great strides in partnership with industry to mitigate robocalls, more work remains. Today, we take another important step. This item adopts significant new requirements, and also proposes to go further to stop robocalls before they reach us at home, work, or on the move.

The item we adopt today takes robust steps to stop robocalls before they reach our domestic networks. Critically, gateway providers' networks are the point of entry for foreign-originated robocalls, which is where the vast majority of robocalls originate. If we can make it more difficult for these illegal and unwanted calls to hit our networks, we will be much closer to winning the fight against robocalls.

So, I support requiring gateway providers to apply STIR/SHAKEN caller ID authentication to unauthenticated foreign-originated SIP calls with U.S. numbers in the caller ID field. I also support requiring these providers to adopt robocall mitigation programs. Authenticating calls is a key part of STIR/SHAKEN, and this requirement will help close a loophole that bad actors use. The item rightly identifies that while STIR/SHAKEN is effective, alone it isn't enough. All carriers should be mitigating robocall traffic as well. I urge carriers that may not already be required to do so, to start now.

But, at the same time, I recognize the significant efforts that these gateway providers, and many providers in general have already undertaken. Many of these gateway providers are using a variety of tools, including analytics and robocall mitigation practices, to help fight robocalls. I'm confident that these tools, when added with the requirements adopted today, will be even more effective.

We must also highlight the importance of enforcement of our rules. If we cannot enforce our rules, we are fighting with one hand behind our back. So, I support the requirement that gateway providers respond to traceback requests within 24 hours of such a request. It is integral that providers quickly respond so that the Commission, providers, and law enforcement can identify the source of illegal calls and act swiftly.

I am also glad to support empowering the Enforcement Bureau to notify gateway providers of illegal traffic, and thereby requiring gateway providers, and in some circumstances, providers immediately downstream in the call path, to block not just the robocall traffic, but all calls from the identified provider. This is an important incentive to providers to keep illegal traffic off your networks, and a shot across the bow to bad actors. Do not bring illegal calls to the United States, and if you do, your traffic will be blocked. It is time for us to deploy all tools in our enforcement authority to stop and punish the bad actors that support these calls.

I also support an expansion of the requirement for providers to file in the Robocall Mitigation Database. The Database has been a success. And, it has seen an increasing number of foreign providers submit information. I hope that today's order will further incentivize gateway providers to push their foreign partners to implement STIR/SHAKEN and file in the Database. Expanding STIR/SHAKEN

¹ U.S. Phones Received Over 3.9 Billion Robocalls in April, Says YouMail Robocall Index, <https://www.prnewswire.com/news-releases/us-phones-received-over-3-9-billion-robocalls-in-april-says-youmail-robocall-index-301540784.html> (May 5, 2022).

deployments abroad will only help to fight robocalls, as robocalls are truly an international problem.

The Further Notice proposes to take additional steps that will bring us closer to an important goal of mine -- regulatory symmetry for all providers: voice, gateway, and intermediary. We currently have different obligations on voice and gateway providers than United States intermediate providers. Bad actors can and do take advantage of these regulatory arbitrage opportunities.

I'm also heartened to see a request in the Further Notice for comment on strengthening enforcement. If we identify a bad actor, it's time to make it harder to operate. If it's a repeat offender, we should go further. I look forward to seeing the record develop on how to strengthen enforcement, and I appreciate the Chairwoman taking my request to lower the proposed attributable interest threshold that a repeater offender may own from 10% down to 5%. Repeat offenders here need to have their control and influence limited.

Overall, this is an important item and a positive step. I'm optimistic that these new requirements, plus our increased emphasis on enforcement, will continue to make it harder for robocalls to proliferate. I will continue to remain vigilant in pushing the Commission to do all it can to eliminate these illegal and unwanted calls going forward. I thank the Commission staff that continues to tirelessly labor on these issues for all their hard work. I approve.