



September 5, 2019

The Honorable Amy Paulin
New York State Assembly
Chair, Assembly Committee on Corporations, Authorities and Commissions
LOB 422
Albany, NY 12248

The Honorable Michael DenDekker
New York State Assembly
Chair, Assembly Committee on Consumer Affairs and Protection
LOB 941
Albany, NY 12248

Dear Chairs Paulin and DenDekker:

On behalf of CTIA, the trade association for the wireless communications industry, I write to update the committee on the wireless industry's efforts to curb robocalls. CTIA members are committed to protecting consumers from illegal robocalls. The wireless industry works to minimize the negative impact of robocalls, collectively stopping millions of calls every day. Some automated calls, including pharmacy reminders, travel updates, or school notices, can be useful, but too many robocalls today are illegal and intrusive.

Carriers and others in the communications ecosystem are aggressively addressing illegal robocalling, caller ID spoofing, and other issues, creating call authentication regimes that will help the entire industry work to combat bad actors. For example, the wireless industry is working with standards bodies, including the Alliance for Telecommunications Industry Solutions or ATIS, to implement caller ID authentication, which is often labeled with its standards name: STIR/SHAKEN (Secure Telephone Identity Revisited and Signature-based Handling of Asserted Information Using toKENS). This is a new system aimed at combating illegal caller ID "spoofing." Such a system will help protect consumers from "spoofed" robocalls, which scam artists often use to trick consumers into answering their phones. The idea behind STIR/SHAKEN is to allow consumers to once again trust their Caller ID by having voice service providers sign their subscribers' telephone numbers with a digital signature to ensure the calling number of a telephone call has not been tampered with. The nationwide carriers are implementing the STIR/SHAKEN framework as one of many tools to determine whether to block or flag robocalls and plan to do so this year.



On August 22, national wireless carriers, along with other voice service providers, announced a partnership with 51 attorneys general to adopt eight principles to fight illegal robocalls.¹ This partnership is a reaffirmation of the commitment made by providers, such as AT&T, Sprint, T-Mobile, US Cellular, and Verizon, to aggressively stop illegal and unwanted robocalls from plaguing consumers. Specifically, those carriers agreed to incorporate, or continue to incorporate, the following anti-robocall principles into their business practices:

- Offer Free Call Blocking and Labeling
- Implement STIR/SHAKEN
- Analyze and Monitor Network Traffic
- Investigate Suspicious Calls and Calling Patterns
- Confirm the Identity of Commercial Customers
- Require Traceback Cooperation in Contracts
- Cooperate in Traceback Investigations
- Communicate and cooperate with state attorneys general about recognized scams and trends in illegal robocalling

A multi-pronged effort is needed to combat illegal robocalls. To that end, wireless carriers continue to monitor traffic across their networks to identify patterns like high-call volumes and short call durations that may be signs of bad actors. Moreover, voice service providers are in communication with each other to help identify illegal callers for referral to the appropriate federal and state enforcement authorities. To aid those enforcement efforts, companies across the wireless industry participate in USTelecom's Traceback efforts with the Federal Communications Commission (FCC) and Federal Trade Commission (FTC) to identify where illegal calls come from.

In addition, the wireless industry continues to educate consumers on ways to curb unwanted robocalls with blocking features and tools that can identify likely "spam." For example, CTIA and its member companies encourage consumers to use blocking features built into devices, install robocall blocking apps, report "spam" messages to wireless providers by forwarding unwanted texts to 7726 (SPAM), and report unwanted calls to the FTC and the FCC through their online portals. Finally, CTIA recently launched a dedicated consumer resource at [FightingRobocalls.CTIA.org](https://fightingrobocalls.ctia.org) to provide consumers with the information and tools needed to help combat illegal robocalls.

In closing, the wireless industry recognizes the need to fight unwanted and illegal robocalls. That is why we are working collaboratively with interested stakeholders, including state attorneys

¹ See Anti-Robocall Principles, *available at*: https://ag.ny.gov/sites/default/files/state_ag_providers_antirobocall_principles-with_signatories.pdf (last accessed Sept 5, 2019).



general, the FCC, and the FTC, to protect consumers from being harassed and scammed. A multi-pronged, multi-faceted approach is essential as illegal robocallers are working around the clock to deceive consumers and carriers. We stand ready to continue our important work in this area.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerard Keegan".

Gerard Keegan
Vice President
State Legislative Affairs