



Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street, NW | Washington, DC 20036 | tel 202.663.8000 | fax 202.663.8007

Glenn S. Richards  
tel 202.663.8215  
glenn.richards@pillsburylaw.com

July 9, 2020

**VIA ECFS**

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: CG Docket No. 17-59 - In the Matter of Advanced Methods to Target  
and Eliminate Unlawful Robocalls**

Dear Ms. Dortch:

On July 8, 2020, Darah Franklin from Google, Rachel Petty from RingCentral and the undersigned, on behalf of the Voice on the Net Coalition (VON), spoke by phone with Jerusha Burnett, Aaron Garza, Kurt Schroeder, Mark Stone and Kristi Thornton from the FCC Consumer Bureau; and, on July 9, Ms. Franklin, Ms. Petty and the undersigned spoke by phone with Zenji Nakazawa, Public Safety and Consumer Protection Advisor for Chairman Pai. During these calls VON recommended that the Commission modify the language of the draft Third Report and Order in the above-referenced docket related to the point of contact for blocking disputes to ensure that a voice service provider is capable of providing a scalable response to blocking disputes both at the consumer-to-provider and provider-to-provider level.<sup>1</sup>

In addition to furnishing a point of contact for consumers, VON recommended that the Commission allow voice service providers the option to make an electronic form available on their publicly available websites that would allow callers to quickly resolve

---

<sup>1</sup> The changes that VON recommended are included in Attachment A.

Ms. Marlene Dortch  
July 9, 2020

blocking disputes.<sup>2</sup> Rather than a *single* point of contact, this would allow a voice service provider to assign resources through its customer relations, security, or operations divisions to address instances of false positives and call blocking. The electronic form would also provide the complainant with more detailed instruction on the type of information that the voice service providers may need to research and resolve the dispute.

Other benefits to the electronic form include a) flexibility for voice service providers on managing requests; 2) ensures requests are properly directed to the appropriate point of contact that can best resolve the dispute; 3) increases the likelihood that the necessary information is collected at the onset to reduce the need for additional correspondence between the complainant and the voice service provider; and 4) creates the possibility of a mobile-friendly user experience to the extent disputes are submitted by mobile phone. Regardless of the form of contact, voice service providers would be required to resolve disputes within a reasonable time.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

By: \_\_\_\_\_ /s/  
Glenn S. Richards  
*Counsel for VON*

CC (via email):

Zenji Nakazawa  
Jerusha Burnett  
Mark Stone  
Kristi Thornton  
Aaron Garza  
Kurt Schroeder

---

<sup>2</sup> VON acknowledged that the form would have to comply with any relevant requirement of the Americans with Disabilities Act.

## ATTACHMENT A

### Para 19:

[...] Finally, we require that blocking providers furnish a ~~single~~ point of contact or electronic form for callers, as well as other voice service providers, to report ~~resolve~~ unintended or inadvertent blocking. ~~We and emphasize that, when blocking, blocking providers~~ they should resolve these blocking disputes in a reasonable amount of time and make all reasonable efforts to ensure that critical calls, such as those from Public Safety Answering Points (PSAPs), are not blocked and that they should never block calls to 911.

### Para 54:

**Point of Contact for Blocking Disputes.** We require that any voice service provider that blocks calls must designate a ~~single~~ point of contact or electronic form for callers, as well as other voice service providers, to report blocking errors at no charge to callers or other voice service providers. ~~122~~ Blocking providers must investigate and resolve these blocking disputes in a reasonable amount of time that is consistent with industry best practice. What amount of time is “reasonable” may vary depending on the specific circumstances of the blocking and the resolution of the blocking dispute. Blocking providers must also publish contact information clearly and conspicuously on their public-facing websites. We further require that when a caller makes a credible claim of erroneous blocking and the voice service provider determines that the calls should not have been blocked, a voice service provider must promptly cease blocking calls from that number unless circumstances change.

### Para 66:

Second, section 10(b) of the TRACED Act provides additional authority for the requirement that terminating voice service providers that block calls must designate a ~~single~~ point of contact or provide an electronic form to report blocking errors and resolve disputes in a reasonable amount of time consistent with industry best practice.

### Para 74:

We encourage alarm companies to take advantage of our requirement in this Order that terminating voice service providers that block calls provide a ~~single~~ point of contact or electronic form for reporting for call-blocking issues, and to educate their customers that alarm calls may be blocked if the customer chooses not to opt out of their voice service provider’s blocking program.

### Appendix A (Final Rules):

(k)(8) Any terminating provider blocking pursuant to this subsection must provide a ~~single~~ point of contact or electronic form, readily available on the terminating provider’s public-facing website, for handling call blocking error complaints and must resolve disputes within a reasonable time. When a caller makes a credible claim of erroneous blocking and the terminating provider determines that the

Ms. Marlene Dortch  
July 9, 2020

calls should not have been blocked, the terminating provider must promptly cease blocking calls from that number unless circumstances change.

**Appendix D, Para 5:**

The *Report and Order* clarifies that any terminating voice service provider that blocks calls must designate a ~~single~~ point of contact or electronic form for callers and other voice service providers to report blocking errors at no charge.

**Appendix D, Para 8:**

In the Report and Order, we require terminating voice service providers to designate a ~~single~~ point of contact or electronic form for resolving blocking disputes and make such ~~contact~~ information clear and conspicuous on their public-facing websites.