



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

October 21, 2021

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

**RE: CG DOCKET NO. 17-59 - Advanced Methods to Target and Eliminate
Unlawful Robocalls**

Dear Ms. Dortch:

The Voice on the Net Coalition (“VON”)¹, by counsel, hereby supports INCOMPAS’ six-month extension of the January 1, 2022, deadline for voice service providers to implement SIP Codes 607 and 608.² Contrary to USTelecom’s dire warnings, the Commission is not faced with a stark choice between no call blocking or allowing providers to return SIP Code 603. Instead, the Commission should maintain the status quo and delay the implementation date for SIP Codes 607 and 608 for six months with a firm warning that further extensions will not be granted.

VON agrees with INCOMPAS that SIP Codes 607 and 608 are far superior to SIP Code 603 to meet the industry need for redress, to assist in the fight against robocalling, and to comply

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP-enabled communications, including interconnected Voice over Internet Protocol (“VoIP”). For more information, see www.von.org.

² See Ex Parte Notice of INCOMPAS, CG Docket No. 17-59 (October 12, 2021) at 1-2.

Ms. Marlene Dortch
October 21, 2021

with the Commission’s real-time blocking notification adopted in the Fourth Report and Order in this docket.³

Adopting anything but SIP Codes 607 and 608 diminishes robocall mitigation efforts. VON members report receiving hundreds of SIP 603 codes each month; and the expected increase of SIP 603 codes from calls blocked using analytics engines will provide originating voice service providers little useful information that will facilitate the redress process that should result from blocking legal calls.⁴ With a flurry of SIP Code 603s, originating providers have no place to start investigations of potential fraudulent calls. When an originating provider receives a 608, it not only provides the opportunity for redress, but also the opportunity for the originating provider to review customers’ use cases for potential robocalling. SIP Code 608s give fraud prevention teams the required insight to identify and remove fraudsters that might initially slip “know your customer” efforts quickly and efficiently. Additionally, SHAKEN/STIR is not going away and instead has pushed industry groups like NANC’s CATA to ask the Commission to solve the IP interconnection problem if the industry is unable to do so in an allotted timeframe. As an industry, we should be working to future-proof the IP network by adopting best practices that drive analytics and metrics into service providers’ networks and allows them to fight robocalling on multiple fronts. We should not, as USTelecom requests, implement solutions that would hinder the industry’s efforts to protect the public from unwanted robocalls.

A reasonable extension on the deployment of SIP Codes 607 and 608 represents a workable compromise. It will give the industry additional time to implement SIP Codes 607 and 608 while allowing providers to continue to block calls. This extension should be accompanied by a strong edict from the Commission that the industry must complete the process to deploy SIP Codes 607 and 608 codes; with a warning that further extensions will not be permitted. It’s unclear from the record, what, if anything, USTelecom members (and others who support the use

³ Specifically, the Commission required that blocked callers be notified using SIP codes 607 (for unwanted calls) and 608 (calls rejected by an intermediary such as an analytics engine). See Advanced Methods to Target and Eliminate Unlawful Robocalls, Fourth Report and Order, 35 FCC Rcd 15221 (2020) ¶¶ 56-60 (“Fourth Report and Order”).

⁴ See also Ex Parte Notice of the Voice on the Net Coalition, CG Docket No. 17-59 (October 5, 2021) (discussing other failings of SIP Code 603).

Ms. Marlene Dortch
October 21, 2021

of SIP Code 603) have doing for the past 10 months since the release of the Fourth Report and Order to prepare for the January 1, 2022, compliance deadline. The extension also obviates the need for the Commission to address USTelecom's hollow threat that without adopting SIP Code 603, its members will disable their current call blocking systems.⁵

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

By: _____ /s/

Glenn S. Richards

Counsel for the Voice on the Net Coalition

⁵ Ex Parte Notice of USTelecom, CG Docket No. 17-59 (October 19, 2021). Even if voice service providers stopped blocking robocalls, consumers have numerous alternatives offered by third parties and wireless device manufacturers. See, [Call Blocking Tools and Resources | Federal Communications Commission \(fcc.gov\)](#) (last visited October 20, 2021).