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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 opposes the Request of USTelecom for Emergency Stay or Waiver in the Alternative (“Request”), filed October 26, 2021, in the above-referenced docket. As discussed below, the Commission should not be distracted by this most recent USTelecom procedural effort to avoid compliance with the requirement that voice service providers implement SIP Codes 607 and 608 to provide real-time blocking notification.² The Commission should instead remain focused on responding to the record established regarding the USTelecom Petition, which raises similar issues.³

As VON has repeatedly demonstrated, the Commission should not waver in its support for SIP Codes 607 and 608; even if comprehensive industry implementation requires an additional six months. SIP Codes 607 and 608 will provide more targeted information to help all voice service providers respond to blocked calls and alert originating voice service providers to potential fraud and illegal robocalls on their own networks. This targeted information will also

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

² 47 CFR § 64.1200(k)(9), effective January 1, 2022.

³ See Petition for Reconsideration and Request for Clarification of USTelecom – The Broadband Association, CG Docket No. 17-59 (filed May 6, 2021) (“Petition”).

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permit originating voice service providers to leverage machine learning to predict and combat other sources of potential fraud, and provide insights for future robocall policy development.

The record in response to the Petition is comprehensive and complete, and most critically, ripe for a ruling. Indeed, there appears to be industry consensus that SIP Codes 607 and 608 will not be ready for widespread implementation on January 1, 2022. Nonetheless, that does not suggest that the Commission must stay or waive the rule prior to issuing a decision on the Petition. Any such interim ruling in response to the Request would simply add unnecessary work for Commission staff, ultimately be duplicative, and risk resulting in confusion for industry as it waits on the long-term resolution. The Request suggests that USTelecom members' true objective is to never implement SIP Codes 607 and 608. That would be a poor result.

VON and INCOMPAS have offered a reasonable compromise that the Commission delay the implementation of SIP Codes 607 and 608 for six months.⁴ This extension is based on the organizations' members efforts to date to comply with the nearly 11-month old order and the work that remains to be done. If USTelecom members have concerns with the six-month timeframe, they should be more specific about the challenges including:

- sharing what they have done to come into compliance with the January 1, 2022, date; and
- what remains to be done, including specifically which software vendors/others in their ecosystem have not provided an upgrade option to support the new requirement.

With less than two months to the January 1, 2022, deadline, this is no time for the Commission to move abruptly away from the original decision, including the potential adoption of other SIP Response Codes. Instead, the Commission should provide industry the time required to properly implement SIP Codes 607 and 608. VON would also request that should the Commission provide additional time, it should also require the parties to report their standards development progress to the FCC on a monthly basis, which hopefully will keep the participants focused on effectively progressing towards final implementation of SIP Codes 607 and 608.

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

⁴ See Ex Parte Notice of VON, CG Docket No. 17-59 (October 21, 2021); Ex Parte Notice of INCOMPAS, CG Docket No. 17-59 (October 12, 2021).