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April 5, 2021

VIA ECFS

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

Re: WC Docket No. 17-97 - Call Authentication Trust Anchor

Dear Ms. Dortch:

On April 1, 2021, Christopher L. Shipley on behalf of INCOMPAS, Michael Pryor on behalf of the Cloud Communications Alliance (CCA) and the undersigned, on behalf of the Voice on the Net Coalition (VON), spoke by phone with Matthew Collins, Daniel Kahn and Jonathan Lechter from the FCC Wireline Competition Bureau concerning VON's Petition for Reconsideration pending in the above-referenced docket.¹ During this call, VON/INCOMPAS/CCA reiterated their support for the VON petition as described in their public filings in the docket. VON/INCOMPAS/CCA also noted the broad industry support for the petition, including both domestic and foreign wireline, VoIP and wireless providers.²

VON/INCOMPAS/CCA stated their concern that many foreign service providers are not aware of the FCC requirement to register in the still-to-be announced Robocall Mitigation Database (RMD), or risk not having certain international originated calls terminated in the United States by U.S. gateway or terminating service providers.

¹ VON Petition for Reconsideration, WC Docket No. 17-97, (filed Dec. 17, 2020) ("Petition").

² CTIA has filed a petition seeking similar relief that has also received broad support. See Petition for Partial Reconsideration of CTIA, WC Docket No. 17-97, (filed Dec. 17, 2020).

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VON/INCOMPAS/CCA noted that they and their members are working to educate foreign service providers about the new rules and encouraged the FCC to collaborate with its regulatory counterparts in other countries to explain the new rules. Mr. Pryor also noted that the rules do not appear to address circumstances where foreign originating service providers hand off calls to foreign intermediate providers (who are not required to register in the RMD). Domestic gateway providers would be unable to accept this voice traffic because the foreign intermediate providers would not be listed in the RMD. VON/INCOMPAS/CCA expressed concern that legitimate calls would not be completed if the rule was to go into effect as written and that the FCC should grant the VON and CTIA petitions and take additional comments on the rule to address the numerous concerns raised by parties filing support of the petitions.

VON/INCOMPAS/CCA also noted that only a single entity, ZipDX, LLC (represented by David Frankel), had opposed the Petition. Mr. Richards explained that he and Mr. Shipley had spoken with Mr. Frankel about his most recent ex parte filing that proposed a possible work-around to the foreign carrier registration requirement that would shift the burden to U.S. providers that accept calls from non-registered entities.³ We noted that this proposal, which, if adopted, would require an additional change to the FCC rules, would, of course, require further notice and comment.

VON/INCOMPAS/CCA also reiterated their support for the VON proposal that the FCC not require specific contact information for the individual responsible for addressing robocall mitigation issues, but allow for the public disclosure of a generic email address monitored by service providers that better aligns with common practice.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

By: _____ /s/
Glenn S. Richards
Counsel for VON

CC (via email):
Matthew Collins
Daniel Kahn
Jonathan Lechter

³ ZipDX, LLC Ex Parte at p. 3, WC Docket No. 17-97 (filed April 4, 2021).