

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Call Authentication Trust Anchor) WC Docket No. 17-79

Reply Comments of Consumers Union, Consumer Action, Consumer Federation of America, National Association of Consumer Advocates, National Consumer Law Center on behalf of its low-income clients, National Consumers League, Public Citizen, and Public Knowledge

Consumers Union, Consumer Action, Consumer Federation of America, National Association of Consumer Advocates, National Consumer Law Center on behalf of its low-income clients, National Consumers League, Public Citizen, and Public Knowledge thank the Federal Communications Commission (FCC) for its work to encourage the development of a caller ID authentication system to address fraudulent call spoofing, and are encouraged by the support for the project revealed in the submitted comments. This work is timely: as we noted, increasingly we hear from consumers about fraudulently spoofed calls that evade call-blocking mechanisms, threaten them with scams and fraud, and disturb their privacy. Thus, we reiterate our call for the FCC to take rapid action, to require full participation by providers, and to take the lead in establishing effective standards for consumer protection.¹

We agree with the commenters who argue that strictly voluntary participation in such a system is insufficient. For example, Richard Shockey of Shockey Consulting notes that “the system will not work unless it is mandated.”² And Comcast, while stopping short of asking the FCC to require participation, recommends that if carriers are reluctant to engage in caller ID authentication, the FCC “should consider further methods to, at minimum, strongly encourage participation by providers of IP-based voice services.”³ Failure of phone companies to participate would dramatically reduce the success of the system. Comcast notes that scammers would likely sign up with a voice provider that does not offer caller ID authentication so as to be able to continue to freely spoof calls.⁴

¹ See Comments of Consumers Union et al., WC Docket No. 17-97 (Aug. 11, 2017), *available at* <http://consumersunion.org/wp-content/uploads/2017/08/Robocalls-FCC-NOI-on-caller-ID-authentication-CU-comments-final.pdf>.

² Comments of Shockey Consulting, WC Docket No. 17-97 9 (Aug. 14, 2017), *available at* <https://ecfsapi.fcc.gov/file/108142861719824/Shockey%20Consulting%20FCC%20Comments%20Call%20Authentic%2017-97%2017-59%20.pdf>.


³ Comments of Comcast Corporation, WC Docket No. 17-97 7 (Aug. 14, 2017), *available at* <https://ecfsapi.fcc.gov/file/1081489527184/Comcast%20Comments%20on%20Call%20Authentication%20NOI.pdf>.

⁴ *Id.* at 6.

It is also important that the FCC guides implementation to guarantee that consumer protections are provided. While several commenters recommended that industry should be left to direct the development of the system, we respectfully disagree.⁵ To make sure that the caller ID system properly protects consumers from fraudulent and unwanted calls, and that consumers' interests are appropriately taken into account, we recommend that the FCC develop standards ensuring that the system includes, at minimum, the protections outlined in our original comments.

With advances in communications technology bringing ever-increasing intrusions on consumer privacy, it is crucial that consumers still be able to salvage their fundamental right to be left alone, and their ability take actions and use tools to protect their privacy. We thank the FCC for its continued efforts to ensure that consumers are protected from unwanted and fraudulent robocalls.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Maureen Mahoney', is positioned below the text 'Respectfully Submitted,'.

Maureen Mahoney
Policy Analyst
Consumers Union
1535 Mission Street
San Francisco, CA 94103

September 13, 2017

⁵ See, for example, Comments of NCTA - The Internet and Television Association, WC Docket No. 17-97 2 (Aug. 14, 2017), *available at* <https://ecfsapi.fcc.gov/file/1081422166800/081417%2017-97%20Comments.pdf>; Comments of CTIA, WC Docket No. 17-97 2 (Aug. 14, 2017), *available at* <https://ecfsapi.fcc.gov/file/10814845612912/AS%20FILED%20Trust%20Anchor%20Comments.pdf>.

Descriptions of the Organizations Joining this Filing

Consumers Union is the public policy and mobilization division of Consumer Reports. Consumers Union works for a fair, just, and safe marketplace for all consumers and to empower consumers to protect themselves, focusing on the areas of telecommunications, health care, food and product safety, energy, and financial services, among others. Consumer Reports is the world's largest independent product testing organization. Using its more than 50 labs, auto test center, and survey research center, the nonprofit organization rates thousands of products and services annually. Founded in 1936, Consumer Reports has over 8 million subscribers to its magazine, website, and other publications.

Consumer Action has been a champion of underrepresented consumers since 1971. A national, nonprofit 501(c)3 organization, Consumer Action focuses on financial education that empowers low to moderate income and limited-English-speaking consumers to financially prosper. It also advocates for consumers in the media and before lawmakers and regulators to advance consumer rights and promote industry-wide change particularly in the fields of credit, banking, housing, privacy, insurance and telecommunications. www.consumer-action.org

The Consumer Federation of America is an association of more than 250 nonprofit consumer groups that was established in 1968 to advance the consumer interest through research, advocacy and education.

The National Association of Consumer Advocates (NACA) is a nonprofit association of consumer advocates and attorney members who have represented hundreds of thousands of consumers victimized by fraudulent, abusive and predatory business practices. NACA is actively engaged in promoting a fair and open marketplace that forcefully protects the rights of consumers, particularly those of modest means.

National Consumer Law Center (NCLC) is a non-profit corporation founded in 1969 to assist legal services, consumer law attorneys, consumer advocates and public policy makers in using the powerful and complex tools of consumer law for just and fair treatment for all in the economic marketplace. NCLC has expertise in protecting low-income customer access to telecommunications, energy and water services in proceedings at the FCC and state utility commissions and publishes Access to Utility Service (5th edition, 2011) as well as NCLC's Guide to the Rights of Utility Consumers and Guide to Surviving Debt.

The National Consumers League, founded in 1899, is America's pioneer consumer organization. Our mission is to protect and promote social and economic justice for consumers and workers in the United States and abroad. For more information, visit www.nclnet.org.

Public Citizen is a national nonprofit organization with more than 400,000 members and supporters. We represent consumer interests through lobbying, litigation, administrative advocacy, research, and public education on a broad range of issues including consumer rights in the marketplace, product safety, financial regulation, safe and affordable health care, campaign finance reform and government ethics, fair trade, climate change, and corporate and government accountability.

Public Knowledge is a nonprofit policy and public interest organization that promotes competition and consumer protection on technology, telecommunications, and intellectual property issues.