

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

**Comments
of**

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

September 24, 2018

The undersigned consumer advocacy groups thank you for continuing to consider the issue of robocall-blocking through this refresh of the record on Advanced Methods to Target and Eliminate Unlawful Robocalls.¹ While scam calls are far from the only type of unwanted robocalls received by consumers,² they pose unique challenges to enforcement efforts. Many of these callers (as well as other callers) hide their identities using caller ID spoofing. Some regularly rotate through a series of numbers displayed on the consumer's caller ID, and often they mimic a local number currently in use, making it nearly impossible and inconvenient for consumers to manually block these calls.³

Nearly a year ago, the Federal Communications Commission (“Commission” or “FCC”) approved rules to allow phone companies to block four specific categories of clearly illegally spoofed calls without first obtaining the call recipient's permission: at the request of the owner of the spoofed number, and calls spoofed using unallocated, unassigned, or invalid numbers.⁴ But no visible progress has been made to actually reduce the volume of unwanted calls. We know from a range of sources, including consumer complaints, that the numbers of unwanted robocalls are climbing.⁵ According to YouMail, the volume of robocalls increased over 45% from the same month one year ago.⁶ Furthermore, Sprint has indicated that the calls that could be caught and blocked pursuant to the new call-blocking rules only constitute a tiny percentage of illegal traffic.⁷

The problem is growing. To truly address the unwanted robocall problem, we urge the FCC to:

- Maintain privately enforceable and effective rules under the Telephone Consumer Protection Act (“TCPA”) to ensure that all non-emergency robocalls and texts continue to require the consent of the person called, and to allow meaningful revocation of that consent;
- Require phone companies to implement caller ID authentication technology by a date certain, at no additional cost, and ensure that the technology is effective, with the ability to screen out all unverified calls;

¹ Fed. Commc'ns Comm'n, Public Notice, Consumer and Governmental Affairs Bureau Seeks to Refresh the Record on Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59 (Aug. 10, 2018), <https://docs.fcc.gov/public/attachments/DA-18-842A1.pdf>.

² YouMail, *4.2 Billion Robocalls in August Set All-Time Record for YouMail Robocall Index* (Sept. 10, 2018), <https://www.prnewswire.com/news-releases/4-2-billion-robocalls-in-august-set-all-time-record-for-youmail-robocall-index-300708998.html>.

³ Fed. Commc'ns Comm'n, *Consumer Alert: Protect Yourself Against 'Neighbor Spoofing,' Scam Callers Placing Calls that Appear to be Local* (March 8, 2018), https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0308/DOC-349632A1.pdf.

⁴ 32 FCC Rcd 9706 (11), <https://www.fcc.gov/document/fcc-adopts-rules-help-block-illegal-robocalls-0>.

⁵ *National Do Not Call Registry Data Book FY 2017*, Fed. Trade Comm'n at 6 (Dec. 2017), https://www.ftc.gov/sites/default/files/filefield_paths/dnc_data_book_fy2017.pdf.

⁶ YouMail, *supra* note 2.

⁷ Comments of Sprint Corporation, CG Docket No. 17-59 at 5 (Jul. 20, 2018), <https://ecfsapi.fcc.gov/file/1072026059446/Sprint%20Robocall%20Comments%20July%2020%202018.pdf>.

- If there needs to be a system for challenging incorrectly blocked robocalls, ensure that it is guided by rules established by the FCC, and is paid for by those callers who seek to benefit from using it;
- Refrain from establishing universal “whitelists” until after effective caller ID authentication is fully implemented; and
- Require all phone providers to offer all of their customers free, optional call-filtering tools.

It’s important that the FCC take further action now, because robocalls are increasingly relentless. They wake up night shift workers during the day, and interrupt caregivers and sick patients when they are trying to recover. Seniors tell us that they have fallen when rushing to catch the phone. Robocalls to cell phones pose additional safety risks when they interrupt consumers when they are driving. In addition, robocallers too often ignore consumers’ requests to stop calling. Some consumers have reported that the callers are abusive when they have asked for the calls to stop. Consumers need better options than to be told to just “hang up.”

Robocalls can be costly to consumers, too. Using Federal Trade Commission (“FTC”) data released in 2013 (the most recently-available government data), we have conservatively estimated that telemarketing fraud cost consumers \$350 million in 2011.⁸ Consumers with limited-minute cell phone plans have reported that robocalls use up their minutes and cost them money. Consumers also tell us that they often use their cell phones for work, so it is not an option to just not answer the phone. These robocalls tie up their phone lines and waste their time when they are on the clock.

Because it is so easy for the caller to hide its identity, robocalls are sometimes used to spread hateful rhetoric. For example, a deeply offensive robocall campaign was used against an African-American candidate for governor in Florida. The robocalls were denounced on both sides of the political aisle, but the damage had already been done.⁹

Spoofed calls also victimize the consumer whose number is spoofed. We have heard from consumers who receive repeated calls from angry neighbors because they have received calls spoofed with the consumer’s number.

⁸ Keith B. Anderson, Staff Report of the Bureau of Economics, Fed. Trade Comm’n, *Consumer Fraud in the United States, 2011: The Third FTC Survey* (April 2013), https://www.ftc.gov/sites/default/files/documents/reports/consumer-fraud-united-states-2011-third-ftc-survey/130419fraudsurvey_0.pdf. There were an estimated 3.5 million telemarketing fraud cases in 2011 (p. 38). The median loss per case was \$100 (p. 39). Thus, an estimated \$350 million was lost to telemarketing fraud in 2011.

⁹ Cleve R. Wootsen, Jr., ‘*We Negroes’ robocall is an attempt to ‘weaponize race’ in Florida campaign, Gillum warns*, WASHINGTON POST (Sept. 2, 2018), <https://www.washingtonpost.com/politics/2018/09/01/an-appalling-robocall-racism-invades-floridas-governors-race-second-time-this-week/>.

The FCC must maintain privately enforceable and effective rules under the TCPA to ensure that all non-emergency robocalls and texts continue to require the consent of the person called, and to allow meaningful revocation of that consent.

Though some in the calling industry have incorrectly argued otherwise,¹⁰ scam robocalls are not the only kind of unwanted robocalls. If the FCC weakens the robocalls rules, as the U.S. Chamber of Commerce and the calling industry has also urged them to do,¹¹ then consumers will receive an even higher percentage of robocalls from debt collectors and other so-called “legitimate” sources.

According to the most recent YouMail data, these “legitimate” telemarketing and debt collection calls make up almost half of the robocalls that consumers receive.¹² Consumers are fed up with these calls as well. TNS, the call-analytics company, reports that debt collection calls are rated extremely negatively.¹³ The CFPB reported that one in four consumers feels threatened by debt collectors, and that most debt collectors refuse to stop calling, even when the consumer has begged them to stop.¹⁴

Stories submitted by consumers reflect the data. Consumers tell us that they receive harassing debt collection robocalls intended for someone else, and that it’s nearly impossible to get the robocallers to stop. In addition, over 30,000 consumers urged the FCC in a recent proceeding to maintain the strongest possible protections against unwanted robocalls.¹⁵ The FCC must ensure that consumers have the opportunity to meaningfully consent to robocalls and always have the ability to stop the calls.

The FCC must require phone companies to implement caller ID authentication technology by a date certain, at no additional cost, and ensure that it is effective, with the ability to screen out all unverified calls.

To fully address the scam robocall problem, caller ID authentication must be compulsory for phone companies, and the FCC must set guidelines to ensure that it is effective. Because it can be difficult for

¹⁰ See, e.g., Comments of the American Association of HealthCare Administrative Management, CG Docket No. 17-59 at 1-2 (Jul. 20, 2018), [https://ecfsapi.fcc.gov/file/10720929113148/AAHAM%20Robocalling%20PN%20Comments%20\(07-20-2018\).pdf](https://ecfsapi.fcc.gov/file/10720929113148/AAHAM%20Robocalling%20PN%20Comments%20(07-20-2018).pdf); Comments of Professional Association for Customer Engagement (PACE) at 2 (Jul. 20, 2018), [https://ecfsapi.fcc.gov/file/10720128858463/PACE%20TCPA%20Comment%20to%20FCC%20\(7-20-18\).pdf](https://ecfsapi.fcc.gov/file/10720128858463/PACE%20TCPA%20Comment%20to%20FCC%20(7-20-18).pdf).

¹¹ U.S. Chamber Institute for Legal Reform et al., Petition for Declaratory Ruling, CG Docket No. 02-278 (filed May 3, 2018), <https://ecfsapi.fcc.gov/file/1051094891940/Petition%20for%20Declaratory%20Ruling.pdf>; Comments of Professional Council for Consumer Engagement, CG Docket No. 02-278 and 18-152 (Jun. 13, 2018), [https://ecfsapi.fcc.gov/file/106130429322839/PACE%20TCPA%20Comment%20to%20FCC%20\(6-13-18\).pdf](https://ecfsapi.fcc.gov/file/106130429322839/PACE%20TCPA%20Comment%20to%20FCC%20(6-13-18).pdf).

¹² YouMail, *supra* note 2.

¹³ Comments of TNS, CG Docket No. 17-59 at 6-7 (Jul. 20, 2018), <https://ecfsapi.fcc.gov/file/10720017728535/TNS%20COMMENTS%20ON%20FCC%20PUBLIC%20NOTICE%20CG%20Docket%20No.%2017-59.pdf>.

¹⁴ Consumer Fin. Protection Bureau, *CFPB Survey Finds Over One-In-Four Consumers Contacted By Debt Collectors Feel Threatened* (Jan. 12, 2017), <https://www.consumerfinance.gov/about-us/newsroom/cfpb-survey-finds-over-one-four-consumers-contacted-debt-collectors-feel-threatened/>.

¹⁵ Reply Comments of Consumers Union, CG Docket No. 18-152 (Jun. 28, 2018), <https://ecfsapi.fcc.gov/file/10629208708577/CU%20TCPA%20Reply%20Comments%206.28.18.pdf>.

phone companies to determine and verify the identity of a spoofed call in real-time as it is coming through the network, it can be a challenge to stop these calls.¹⁶ Caller ID verification procedures, such as SHAKEN/STIR, have a great deal of promise in addressing the scam robocall problem, but only if the FCC takes the lead to guide compliance. While work towards implementing caller ID authentication technology appears to be progressing, the effort should be re-conceptualized so as to be more effective for consumers.

First, consumers must be represented in the governance of SHAKEN/STIR. The FCC should set guidelines for the implementation of caller ID authentication and, at the very least, ensure that a consumer representative is on the governance board that manages SHAKEN/STIR. Currently, industry is taking the lead in managing SHAKEN/STIR, and only representatives of telecommunications or technology companies have been invited to participate.¹⁷ As Henning Schulzrinne, former Chief Technology Officer of the FCC, noted in his Minority Report to the North American Numbering Council's recent report on caller ID authentication, as consumers have a direct stake in this effort, their interests should be represented as well.¹⁸ He further noted that technical expertise is not required in order to participate meaningfully on the governance board.¹⁹ The FCC should immediately ensure that consumer voices are represented on the board.

Second, the FCC must set a deadline for compliance. Several phone companies have made commitments to begin deploying this technology in 2019.²⁰ However, most of the phone companies will need to participate in order for it to be effective. Verizon explains, "Any calls not originated by a provider that signs calls using the STIR/SHAKEN protocol, or any calls transiting any non-STIR/SHAKEN providers, cannot be authenticated."²¹ This is because calls are typically routed through multiple phone companies before they reach the call recipient. Unless nearly all of the phone companies are capable of transmitting the verification information along the call path, the system will not address the problem. Additionally, because most call-blocking is based on an assessment of caller ID information, until SHAKEN/STIR is mandatory, fully implemented, and nearly all calls are assessed, including those originating internationally, call-blocking will be imprecise. The FCC should require all of the phone companies to comply to ensure that it will be effective. Verizon and Comcast, too, have signaled their

¹⁶ Fed. Trade Comm'n, *Robocalls: All the Rage, An FTC Summit* at 127-128 (Oct. 18, 2012), https://www.ftc.gov/sites/default/files/documents/public_events/robocalls-all-rage-ftcsummit/robocallsummittranscript.pdf.

¹⁷ Letter from ATIS to FCC Commissioners (Sept. 13, 2018), <https://ecfsapi.fcc.gov/file/10913940405809/STI-GA%20Letter%20to%20the%20FCC%209.13.18.pdf>.

¹⁸ NANC Call Authentication Trust Anchor Working Group, *Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR* at 24-25 (May 18, 2018), http://www.nanc-chair.org/docs/mtg_docs/May_18_Call_Authentication_Trust_Anchor_NANC_Final_Report.pdf [hereinafter NANC Report].

¹⁹ *Id.*

²⁰ See, e.g., Comments of AT&T, CG Docket No. 17-59 at 6 (Jul. 20, 2018), <https://ecfsapi.fcc.gov/file/107202129719577/7.20.2018%202018%20Robocall%20Report%20Comments%20FINAL.pdf>; Comments of Verizon, CG Docket No. 17-59 at 6 (Jul. 20, 2018), <https://ecfsapi.fcc.gov/file/1072021107952/2018%2007%2020%20Verizon%20Robocall%20PN%20Comments.pdf>.

²¹ *Id.*

support for certain STIR/SHAKEN mandates.²² Smaller phone companies may need more time to implement this technology, and appropriate allowances should be given to them by the FCC. Nevertheless, the Canadian regulator has required SHAKEN/STIR implementation by the end of March 2019,²³ and there is no good reason that the FCC should not issue a similar required implementation date.

Third, the FCC should ensure that any implementation of SHAKEN/STIR provides the option for consumers to screen out unverified calls. It is not sufficient for caller ID authentication and associated services to simply indicate the accuracy of the caller ID information. Just as caller ID has not stopped the scourge of robocalls, simply providing more information to consumers would fail to address much of the harm associated with robocalls, which is the interruption coming from the ringing telephone. Caller ID authentication must be paired with a free, effective mechanism to screen out all calls that fail to verify their caller ID information—for example, redirecting the calls to voicemail or to a separate “spam” folder that consumers can review later at their convenience.

Consumers may have different levels of tolerance for robocalls. For some, such as those with dementia, it may only be appropriate to receive calls from a smaller specified set of numbers. Others may choose to receive informational calls, and would prefer more selective call-blocking. But no reasonable person would want to receive scam robocalls, and from a law enforcement perspective there is no good reason to ever permit these calls from reaching any consumer.

Next, SHAKEN/STIR must protect all consumers, from all unwanted spoofed calls. Currently, SHAKEN/STIR operates on Voice over Internet Protocol (VoIP) lines only.²⁴ Since most fraudulent calls originate on VoIP, this approach already has the potential to address the majority of scam calls.²⁵ But a remaining question is whether SHAKEN/STIR can help protect call recipients on traditional landlines. Henning Schulzrinne has noted that, “[g]ateway providers that bridge between VoIP and legacy systems can perform validation.”²⁶ Thus, it is technologically possible that traditional landline consumers could benefit from the current SHAKEN/STIR system in some way, such as by having their gateway provider block all unvalidated calls.

²² Comments of Verizon, *supra* note 20, at 6; Comments of Comcast Corporation at 6-7, WC Docket No. 17-97 (Aug. 14, 2017), <https://ecfsapi.fcc.gov/file/1081489527184/Comcast%20Comments%20on%20Call%20Authentication%20NOI.pdf>.

²³ NANC Report, *supra* note 18, at 16.

²⁴ Fed. Comm’n Comm’n, Call Authentication Trust Anchor, Notice of Inquiry (July 14, 2017) at ¶ 39, *available at* <https://ecfsapi.fcc.gov/file/07141096201120/FCC-17-89A1.pdf> [hereinafter NOI].

²⁵ *Abusive Robocalls and How We Can Stop Them, Before the U.S. Senate Comm. on Commerce, Science, and Transportation*, 115th Cong. at 1 (2018) (testimony of the Fed. Trade Comm’n), https://www.ftc.gov/system/files/documents/public_statements/1366628/p034412_commission_testimony_re_abusive_robotcalls_senate_04182018.pdf [hereinafter “FTC Testimony”].

²⁶ *Ringling off the Hook: Examining the Proliferation of Unwanted Calls, Before the U.S. Special Comm. on Aging*, (Testimony of Henning Schulzrinne, Levi Professor of Computer Science and Electrical Engineering Columbia University) at 5 (Jun. 10, 2015), https://www.aging.senate.gov/imo/media/doc/Schulzrinne_6_10_15.pdf.

Furthermore, SHAKEN/STIR currently does not protect against calls originating internationally, and the FCC must take action to ensure that it does.²⁷ As it is currently conceived, SHAKEN/STIR will only be helpful to the extent that carriers are participating. Even if the FCC mandates SHAKEN/STIR implementation, its authority does not extend to carriers outside of the United States. This raises significant concerns, because according to the FTC, many illegal robocalls originate overseas.²⁸ The FCC should find a way to address this, perhaps by coordinating with other countries, or even consider requiring phone companies to mandate use of SHAKEN/STIR in their business contracts.

Finally, there are legitimate reasons to spoof certain kinds of calls, and consumers should have the option to decline to transmit their caller ID information to the recipient. The TCPA and FCC rules protect the ability of callers to suppress their caller ID information.²⁹ The FCC has indicated that SHAKEN/STIR has the ability to indicate that the caller ID information has been verified by the provider without sending the full caller ID information to the call recipient.³⁰ We urge the FCC to require SHAKEN/STIR to have that functionality.

If there needs to be a system for challenging incorrectly blocked robocalls, the FCC must establish rules to guide it, and ensure that it is paid for by those callers who seek to benefit from using it.

When caller ID authentication is fully implemented and works appropriately, then false positives will be relatively rare. If the FCC determines that there needs to be a system for challenging incorrectly blocked robocalls, the FCC should oversee it, and evaluate call-unblocking requests in a way that ensures consumer wishes are respected. Above all, the consumer must remain in control of the calls they receive.

The call-unblocking system should be covered by a certain set of criteria established by the FCC. First, for a call to be unblocked, its caller ID information must be authenticated, to ensure that scammers are not seeking to evade blocks. Second, evaluators should have a reasonable basis to believe that the call is not illegal before unblocking it. Even so-called “legitimate” callers may make calls in violation of the consent requirements of the Telephone Consumer Protection Act (TCPA) or the Do Not Call Registry, and the caller’s history of TCPA compliance should be considered before unblocking the calls. Third, consumer preferences should never be overridden. Consumers must be consulted before a call to them is unblocked. Finally, it is also essential that the system is paid for by callers who will benefit from its availability. The costs of controlling robocalls should not be borne by consumers.

²⁷ Comments of Sprint Corporation, CG Docket No. 17-59 at 2 (Jul. 20, 2018), <https://ecfsapi.fcc.gov/file/1072026059446/Sprint%20Robocall%20Comments%20July%2020%202018.pdf>.

²⁸ FTC Testimony, *supra* note 25, at 1.

²⁹ 47 U.S.C. § 227(e)(2); 47 C.F.R. §64.1604(b).

³⁰ NOI, *supra* note 24, at ¶ 43.

The FCC must refrain from establishing universal “whitelists” until after effective caller ID authentication is fully implemented.

Universal “whitelists” that give specific numbers, like designated emergency numbers, an automatic green light should only be considered if caller ID authentication has been fully implemented and is assessing all calls, including those originating overseas. This is important, because otherwise scammers would be incentivized to spoof emergency numbers on a whitelist, making our current spoofing problem far worse. It is clearly too early to implement such a tool. If whitelists are considered after caller ID authentication has been fully implemented, they should apply only to truly emergency calls—as deemed by the FCC as exempt from the consent requirements of the TCPA on that basis. Otherwise, unwanted calls could evade optional call-blocking systems.

The FCC must require phone companies to offer all of their customers optional call-filtering tools.

The FCC should not delay in requiring phone companies to provide free, advanced, and optional call-blocking technologies to all of their customers. These tools can be helpful in protecting consumers from unwanted calls, and traditional landline customers in particular lack free and effective call-blocking options.³¹ Though some wanted calls may also be unintentionally blocked, consumers should have the opportunity to take advantage of these call-mitigation technologies, as long as they are made meaningfully aware of those trade-offs.

Moreover, phone companies should consider other options, such as sending suspicious calls to “spam folders,” to help prevent consumers from missing wanted calls. Already, to combat the neighbor spoofing problem, the Nomorobo app for smartphones gives consumers the option of sending all local calls (except those in the consumer’s contacts) to voicemail.³² Clearly, creating spam folders for phone service is technologically possible; more consumers should have this option.

The FCC should also encourage phone companies to consider opt-out call mitigation mechanisms. For example, Sonic, a voice service provider in California, offers Nomorobo on the network level as an opt-out feature.³³ Because so few consumers opt-in to robocall blocking tools, yet continually express their frustration with the unending barrage of nuisance calls, clearly many consumers are not aware of their options. This is exacerbated by the fact that there are different mitigation options depending on the phone service provider and on the consumer’s type of phone service (traditional landline, VoIP, or wireless). The FCC should require phone providers to offer free tools to screen out unwanted robocalls to all of their customers, and consider requiring tools that are implemented on an opt-out basis.

³¹ *New Study Finds Some Phone Companies Offer Better Robocall Protections Than Others*, CONSUMER REPORTS (Oct. 26, 2016), <https://www.consumerreports.org/consumer-protection/the-best-service-providers-for-blocking-robocalls/>.

³² Nomorobo, About “Unblockable” Robocalls, <https://nomorobo.zendesk.com/hc/en-us/articles/115001757283-About-Unblockable-Robocalls>.

³³ Sonic, Spam Call Blocking, <https://ecfsapi.fcc.gov/file/1051094891940/Petition%20for%20Declaratory%20Ruling.pdf>.

In addition, because the unwanted robocall problem has gotten worse, the FCC should continue to consider other steps to help address it. For example, to require phone companies to follow Verizon's lead, which is taking steps to assess whether calls placed to its subscribers through other providers are legitimate.³⁴ The FCC should also consider, for example, charging domestic phone service providers fees for call traffic associated with illegal robocalls, such as abandoned and short-duration calls, to raise the costs of scam calls.

Thank you again for your continued attention to this significant consumer concern.

Respectfully submitted,

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³⁴ Comments of Verizon, *supra* note 20, at 9.

Descriptions of the Organizations Joining this Filing

Consumers Union is the advocacy 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, food and product safety, energy, and financial services, among others. Consumer Reports is the world's largest independent product testing organization. Using its dozens of 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 6 million subscribers to its magazine, website, and other publications.

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 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.

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 utilities. www.consumer-action.org

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.

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.