Before the
Federal Communications Commission
Washington, D.C. 20554

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

COMMENTS OF T-MOBILE USA, INC.

T-Mobile USA, Inc.[1] ("T-Mobile") supports efforts by the Commission to empower wireless carriers to improve service for customers.[2] Fraudulent calls are a major concern for T-Mobile customers as well as for T-Mobile. T-Mobile is eager to continue its efforts to reduce the number of fraudulent calls its customers receive.

I. T-MOBILE SUPPORTS EFFORTS TO REDUCE FRAUDULENT CALLS.

As T-Mobile noted in initial comments on this proceeding,[3] it offers two valuable services based on identification of fraudulent calls—automatically highlighting to customers likely scam calls and, with their opt-in, blocking those calls from reaching their devices. Scam ID identifies calls that are likely to be from scammers by displaying "Scam Likely" on the subscriber's handset. The customer can then choose whether to ignore or answer the call. T-Mobile offers Scam ID as a free service on all postpaid and Metro PCS plans. Scam ID is a network-based service automatically activated on all phones with caller ID; because it is automatically activated at the network level, customers do not need to install software or apps, or

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1 T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

2 *Consumer and Governmental Affairs Bureau Seeks to Refresh the Record on Advanced Methods to Target and Eliminate Unlawful Robocalls,* Public Notice, DA No. 18-842, CG Docket No. 17-59 (rel. Aug. 10, 2018).

3 Comments of T-Mobile USA, Inc., CG Docket No. 17-59 (filed July 3, 2017).

perform any handset configuration to use the service. Customers may turn Scam ID off online at mytmobile.com, via the T-Mobile app on their devices, or by calling Customer Care. Most customers do not opt to turn it off, however, because they quickly realize it is a valuable service that allows them to make an informed choice about whether to answer a call that has been identified as "Scam Likely." Scam Block goes beyond Scam ID by allowing T-Mobile customers to block calls that are identified as fraudulent at the network level (and would otherwise make their devices ring with the Scam Likely notification) before the calls are delivered to their handset. Scam Block is also a free service available with all T-Mobile postpaid and Metro PCS plans and, like Scam ID, does not require installation of software or apps. Customers can switch Scam Block on and off by dialing a three-digit short code on their handsets or calling Customer Care.

T-Mobile makes great efforts to ensure that calls labeled as "Scam Likely" are, in fact, from fraudsters. While the service is highly reliable, it is not yet perfect. Consequently, T-Mobile is continuously working to further refine its modeling and analysis and to quickly correct any circumstance where calls have been incorrectly categorized as potentially fraudulent. T-Mobile's vendor, First Orion, offers a platform (www.calltransparency.com) that enables call originators to proactively engage to minimize any issues.

In the last year and a half, T-Mobile has seen the number of subscribers electing to use Scam Block expand by 280 percent. Through August 2018, T-Mobile has screened 52.7 billion calls, identified 5.16 billion as likely to be fraudulent, and blocked 986 million calls. T-Mobile

and First Orion estimate that these efforts have resulted in enormous economic savings to T-Mobile subscribers.[4] This represents a tremendous positive benefit to consumers.

While much of the rhetoric around identifying and blocking fraudulent calls points to the number of blocked calls as a measure of success, T-Mobile cautions the Commission from thinking about the numbers in only this way. As carriers block more calls from invalid numbers, fraudsters will adapt their tricks. Indeed, T-Mobile has seen this effect over the last year, as the number of spoofed calls—and particularly calls that use neighbor-spoofing, in which fraudsters deploy legitimate numbers that appear local to the called party—has increased, as have tactics that involve disguising the origination of such calls by transporting them through multiple CLECs' facilities. These are newer tactics that carriers and other providers cannot yet fully address. Furthermore, as scammers adapt to avoid being blocked, customers have become wary—many now refusing to answer any call from an unrecognized number at all, which may make the available data more difficult to analyze. T-Mobile's focus, therefore, is and will continue to be holistic solutions that do not rely solely on blocking calls.

Identifying and protecting consumers from the harms of fraudulent calls requires providers to constantly balance competing equities—empowering consumers with the best information to identify likely scam calls, working with legitimate businesses to ensure their calls go through, and keeping pace with the shifting tactics fraudsters use.

[4] Sources estimate that the average loss from a fraudulent call is from $274 to more than $400. *See* Maria LaMagna, *Here's How Much Phone Scams Cost Americans Last Year…*, MARKETWATCH (Apr. 21, 2017, 4:24 PM), https://www.marketwatch.com/story/heres-how-much-phone-scams-cost-americans-last-year-2017-04-19.

II. THE COMMISSION SHOULD REMAIN MINDFUL OF THE COMPLEXITY OF THE PROBLEM.

The most important truth to consider while developing strategies to fight fraudulent calls is that it is, and likely will remain, nearly impossible to identify all, or even most, fraudulent calls with absolute certainty. Short of verifying the originator of the calls, the best carriers can do is continually refine the indicia of fraudulent calls—which will always be changing—and identify calls that reflect that indicia. As the industry-developed set of protocols and procedures for the real-time authentication of telephone numbers known by its acronym "SHAKEN/STIR" is adopted by carriers, the ability to identify scam calls will increase in proportion to that adoption. SHAKEN/STIR is not a panacea, however.

First, SHAKEN/STIR can only provide a positive affirmation of the source of a given call. It cannot provide confirmation of the opposite—that is, that a call is definitively "bad" or fraudulent. This is particularly true where calls are carried by international providers that do not participate in SHAKEN/STIR and send calls to the United States through wholesale partners.

Second, it is highly likely that the majority of fraudulent calls originate outside of the United States. Thus, while the ability to identify scam calls will increase in proportion to the adoption of SHAKEN/STIR by more and more carriers, adoption must go beyond domestic carriers to also include international carriers to have a real effect on the onslaught of fraudulent calls.

Finally, SHAKEN/STIR requires IP interconnection; thus, legacy networks will not be able to source or transmit verification data for calls. As the Commission looks at ways it might address fraudulent calls, it must not forget this reality. As T-Mobile noted in its comments in the Commission's intercarrier compensation proceeding analyzing arbitrage,[5] retail traffic (as

[5] Comments of T-Mobile USA, Inc., WC Docket No. 18-155 (filed July 20, 2018).

compared to wholesale traffic) sent to T-Mobile's customers contains virtually no robocalls—that is, nearly all fraudulent calls come through exchanges of wholesale traffic.[6] T-Mobile believes this is because market changes have put pressure on revenues for wholesale carriers, which have led some to engage in practices like masking the nature of the traffic (*e.g.*, making inter-MTA traffic appear to be local traffic to avoid the obligation to pay terminating access charges) and serving parties who generate large volumes of traffic, including robocalls and one-way services. T-Mobile's use of Inteliquent as its homing tandem, therefore, is critical to its ability to identify and block fraudulent traffic. As the work continues toward the IP transition and initiatives such as SHAKEN/STIR, the Commission should be careful not to prohibit use of these types of tools that T-Mobile believes are important to its efforts to reduce the amount of fraudulent traffic sent to its end users.

Expansion of SHAKEN/STIR and the adoption of international accords to reduce the number of fraudulent robocalls will have limited effect without simultaneous efforts to expedite the IP transition. Thus, T-Mobile encourages the Commission to take further efforts to encourage direct IP interconnection—including adoption of T-Mobile's "Safe Harbor POI" proposal. Last year, T-Mobile proposed that the Commission work to designate one or more "safe harbor" points of interconnection ("POIs") per state or group of states.[7] This proposal would have numerous benefits—but particularly relevant to this proceeding, it would expedite the IP transition by eliminating the current requirement for carriers to exchange traffic at tens, hundreds, or even thousands of POIs. Even absent SHAKEN/STIR, exchanging traffic at Safe Harbor POIs would enable carriers to more easily identify, manage, and reduce fraud, arbitrage,

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6 *Id.* at 6.

7 Comments of T-Mobile USA, Inc., WC Docket No. 10-90, 01-92 at ii (filed Oct. 26, 2017).

and robocalling, though of course as carriers migrate to IP interconnection, SHAKEN/STIR will have wider and more profound benefits to consumers.

In short, T-Mobile supports the Commission's efforts to tackle the complex problem of eliminating fraudulent and unwanted robocalls. As the Un-carrier, T-Mobile is particularly concerned about sparing our customers from unwanted robocalls. While T-Mobile provides its customers with tools to take positive control of the calls that they receive to help mitigate this problem in advance of emerging industry adoption of SHAKEN/STIR, it also encourages the FCC to support further innovations such as its "Safe Harbor POI" proposal as part of the long-term solution to eliminate fraudulent robocalls. Working together, we can place even greater control in the hands of consumers and stay one step ahead of fraudulent robocallers.

Respectfully submitted,

Kristine Laudadio Devine
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street NW, Eighth Floor
Washington, DC 20036
(202) 730-1300

Counsel to T-Mobile USA, Inc.

Indra Chalk
T-MOBILE USA, INC.
601 Pennsylvania Ave., NW
North Building, Suite 800
Washington, DC 20004
(202) 654-5900

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