

FCC Consumer Advisory Committee Recommendation Regarding Caller ID Authentication

1. WHEREAS consumers are fed up with illegal and unwanted robocalls and are losing trust in voice services¹ and consumers are confused about and suspicious of the caller ID information—such as telephone number, caller name, and/or call labels—displayed on their phones;²
2. WHEREAS consumers, businesses, and the economy suffer from illegal caller ID spoofing, where bad actors deliberately falsify caller ID information (such as caller name and/or telephone number) to mislead the consumer about the calling party’s true identity in an attempt to harm or deceive the called party;³
3. WHEREAS over 80% of scam callers manipulate caller ID by displaying a telephone number that looks familiar to the consumer (through neighbor spoofing or enterprise spoofing)⁴ to entice the called party to answer, which results in 1 out of 3 scam calls being answered because the call appears to be from a familiar telephone number,⁵ and some predict that illegal caller ID spoofing will only increase moving forward;⁶
4. WHEREAS the Federal Communications Commission (Commission) and industry are taking action to combat illegal and unwanted robocalls, including focusing on preventing illegal caller ID spoofing.⁷ The implementation and improvement of caller ID authentication, including SHAKEN (Signature-based Handling of Asserted information using toKENs)/STIR (Secure Telephony Identity Revisited), remain top priorities for voice service providers, wireless device manufacturers, third-party data analytics engines, and other entities;⁸
5. WHEREAS industry has developed SHAKEN/STIR for calls on IP-based telephone networks and certain user equipment and has made major strides towards its implementation;⁹
6. WHEREAS consumers and legitimate callers who use IP-based services will benefit from voice service providers’ implementation of SHAKEN/STIR, which verifies the entity originating a call is entitled to use the telephone number displayed, allowing voice service providers to sign and verify calling numbers;¹⁰
7. WHEREAS certain telephone network technologies (e.g., “legacy” technology including non-IP network technologies, such as TDM networks) and certain user equipment do not support SHAKEN/STIR.¹¹ The Commission has sought comment on and is exploring ways to encourage caller ID authentication for carriers that maintain all or some portion of their network on legacy technology;¹²

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8. WHEREAS SHAKEN/STIR is one element of an ongoing, broader, multi-pronged strategy to target and reduce illegal and unwanted robocalls and help restore consumer trust in voice services and protect consumers;¹³
9. WHEREAS the Commission recognized that call blocking “in conjunction with call labels” can substantially reduce the volume of illegal and unwanted robocalls that reach consumers by empowering consumers with information about the call’s source and level of risk. Such information can inform consumers’ choice whether to answer or ignore the call based on the information presented and also helps ensure that any illegally spoofed calls that get through can be more easily traced back to their originating source;¹⁴
10. WHEREAS industry has developed and implemented a variety of consumer-facing display practices and call labeling mechanisms,¹⁵ which can benefit many consumers by analyzing and labeling billions of calls monthly and empowering consumers to make informed choices about answering the phone calls they receive;¹⁶
11. WHEREAS studies demonstrate that caller ID services and call management apps that provide consumers with more information about the authentication of a calling telephone number and other data improve consumer trust in incoming calls, yet certain call labels and displays may confuse consumers;¹⁷
12. WHEREAS call labeling services and consumer display practices will continue to evolve in response to illegal and unwanted robocaller tactics, changing technology, and consumer expectations;
13. WHEREAS the Commission, industry, and other stakeholders have developed a number of consumer-education resources to inform consumers about call labeling, robocall mitigation services, and other consumer protection tools,¹⁸ yet more needs to be done with respect to these issues.

NOW, THEREFORE IT IS

1. RECOMMENDED that voice service providers clearly and proactively inform and educate consumers about the caller ID-related services they offer, including a) caller identification; b) call labeling and display practices; c) what information call labels may convey; d) what action consumers should take relative to each label; e) the capabilities and limitations of the SHAKEN/STIR caller ID authentication framework; and f) whether providers offer SHAKEN/STIR to their customers;¹⁹

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2. RECOMMENDED further that the Commission develop webpages and educational campaigns that use simple language, visuals, and videos to provide consumers explanations of and resources on SHAKEN/STIR and the call authentication capabilities and limitations of various voice service networks (e.g., IP, TDM), and links to voice service providers' websites;
3. RECOMMENDED further that voice service providers maintain customer service and other resources to help consumers and call originators obtain answers to questions and resolve issues related to reports of call labeling, including potential mislabeling;
4. RECOMMENDED further that the Commission keep evaluating how best to encourage voice service providers to continue innovating and improving caller ID services that empower consumers with the relevant call information, which may include additional information along with the combined results of SHAKEN/STIR and reasonable analytics;
5. RECOMMENDED further that the Commission, industry, consumer groups, and other stakeholders conduct studies and solicit input on what factors voice service providers should consider for displaying caller ID information to consumers, including a) SHAKEN/STIR verification; b) caller identity information; c) telephone number authentication; and d) other information about the call. These entities should also evaluate how consumers respond to call labeling, including whether call label displays are effective at communicating authenticated caller information and prompting consumer action that mitigates harms from illegal and unwanted robocalls. These entities should share the information, as appropriate, in order to promote best practices; and
6. RECOMMENDED further that the Commission continue to collaborate with industry, consumer advocacy groups, federal, state and local government agencies, and other stakeholders to educate consumers about how caller ID services, consumer display practices, and other measures can respond to evolving illegal and unwanted robocaller tactics, protect consumers, and restore trust in voice services.

Adopted unanimously December 11, 2019

Respectfully submitted:
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ENDNOTES

¹ See *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor, Declaratory Ruling and Third Further Notice of Proposed Rulemaking*, FCC 19-51, ¶ 10 (rel. June 7, 2019) (quoting multiple consumers who have stopped answering their phones unless they already recognize the number) (“*June 2019 Robocalling Order*”); see also *Here are the best ways to block robocalls right now*, NBC NEWS (May 31, 2019), <https://www.nbcnews.com/better/lifestyle/scammers-manipulate-caller-id-here-are-best-ways-block-robocalls-ncna1011916> (“You can’t trust caller ID any longer”).

² Cf. *August 2019 Spoofing Order*, ¶ 3 (noting that “malicious caller ID spoofing . . . causes billions of dollars of harm to millions of American consumers each year”).

³ See *Implementing Section 503 of Ray Baum’s Act, Rules & Regulation Implementing the Truth in Caller ID Act of 2009*, Second Report and Order, FCC 19-73, ¶ 1 (rel. Aug. 5, 2019) (“In just the first six months of 2019, the Commission received over 35,000 consumer complaints about caller ID spoofing.”) (“*August 2019 Spoofing Order*”); *Implementing Section 503 of Ray Baum’s Act, Rules & Regulation Implementing the Truth in Caller ID Act of 2009*, Notice of Proposed Rulemaking, FCC 19-12, ¶ 1 (rel. Feb. 15, 2019) (“In 2018 alone, we received over 52,000 consumer complaints about caller ID spoofing.”).

⁴ See First Orion, *Scam Call Trends and Projections Report, Summer 2019*, at 5, http://firstorion.com/wp-content/uploads/2019/07/First-Orion-Scam-Trends-Report_Summer-2019.pdf; AARP, *Robocalls*, <https://www.aarp.org/money/scams-fraud/info-2019/robocalls.html>.

⁵ See First Orion, *Scam Call Trends and Projections Report, Summer 2019*, at 3, http://firstorion.com/wp-content/uploads/2019/07/First-Orion-Scam-Trends-Report_Summer-2019.pdf.

⁶ See *June 2019 Robocalling Order*, ¶ 9 (“First Orion projects that . . . neighbor spoofing will increase to the point where nine out of ten scam calls will be from a familiar area code in 2019.”).

⁷ See, e.g., *Implementing Section 503 of RAY BAUM’s Act, Rules and Regulation Implementing the Truth in Caller ID Act of 2009*, WC Docket Nos. 18-335, 11-39 (rel. Aug. 5, 2019) (issuing forfeitures totaling more than \$200 million and proposing another \$37.5 million in fines for violations of the FCC’s Truth in Caller ID rules in the year leading up to its order); *Consumer Guides: Caller ID Spoofing*, FCC.gov, <https://www.fcc.gov/consumers/guides/spoofing-and-caller-id>.

⁸ See *Chairman Pai Calls on Industry to Adopt Anti-Spoofing Protocols to Help Consumers Combat Scam Robocalls*, FCC (Nov. 5, 2018), <https://docs.fcc.gov/public/attachments/DOC-354933A1.pdf>.

⁹ For recent examples of industry efforts, see FCC, *Combating Spoofed Robocalls with Caller ID Authentication*, <https://www.fcc.gov/call-authentication>; FCC, *Commissioner Starks Releases Free Robocall Blocking Responses*, <https://www.fcc.gov/document/commissioner-starks-releases-free-robocall-blocking-responses>.

¹⁰ See *New Specification by ATIS and SIP Forum Advances Network Capabilities to Mitigate Unwanted Robocalling and Caller ID Fraud*, ATIS (Feb. 2, 2017), <https://sites.atis.org/insights/new-specification-atis-sip-forum-advances-network-capabilities-mitigate-unwanted-robocalling-caller-id-fraud/>; Jim McEachern, *SHAKEN & Know Your Customer*, ATIS at 3 (Oct. 2018).

¹¹ Entities are currently exploring solutions for addressing robocalls on TDM networks. See, e.g., Comments of the Competitive Carriers Association, CG Docket No 17-59, WC Docket No. 17-97, at 2 (filed July 23, 2019) (stating the “Commission also should be mindful” that a large number of voice service providers such as in rural America, “continue to operate TDM networks or receive significant amounts of traffic via TDM tandems” which causes many unique problems for the implementation of STIR/SHAKEN).

¹² The Commission has noted the work on “Out of Band STIR” in the IETF, for example. See *STIR Out-of-Band Architecture and Use Cases*, IETF Internet Draft, <https://tools.ietf.org/html/draft-ietf-stir-ooob> (last visited June 7, 2019). However, hybrid software or products for TDM networks face significant interoperability issues since they will not be standardized to function across all networks for all carriers. It is not clear how TDM switches in a carrier’s network would interface into the SHAKEN/STIR framework to generate the right process for the call to termination, so further study is required for these products and other technologies.

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¹³ See *Chairman Pai on the SHAKEN/STIR Robocall Summit* (July 11, 2019), <https://docs.fcc.gov/public/attachments/DOC-358430A1.pdf> (noting that “there is no silver bullet to solving the problem of unwanted robocalls”)

¹⁴ See *June 2019 Robocalling Order*, ¶ 50.

¹⁵ For recent examples of industry efforts, see FCC, *Combating Spoofed Robocalls with Caller ID Authentication*, <https://www.fcc.gov/call-authentication>; FCC, *Commissioner Starks Releases Free Robocall Blocking Responses*, <https://www.fcc.gov/document/commissioner-starks-releases-free-robocall-blocking-responses>.

¹⁶ See, e.g., Hiya, *State of the Phone Call: Half Yearly Report 2019*, at 8 (2019), <https://assets.hiya.com/public/pdf/HiyaStateOfTheCall2019H1.pdf?v=6b7b682837c56c47656c012c1da0e6a0> (analyzing over 13 billion monthly calls globally to identify incoming and outgoing calls, giving users the information they need to decide whether to block unwanted robocalls from ringing through to their device); *id.* at 4 (reporting an average pick-up rate of about 70% for calls saved in contacts or identified as a verified business compared to 26% and 11% for calls that are either not identified, or identified as spam, respectively).

¹⁷ See, e.g., Lavinia Kennedy, *Impacts of TN Validation on User Display: Cequent User Study Findings* (May 1, 2019) (presentation on file with the Consumer Advisory Committee).

¹⁸ See, e.g., *Caller ID Spoofing*, FCC Consumer Guide (updated July 15, 2019), <https://www.fcc.gov/consumers/guides/spoofing-and-caller-id>; *Fighting Robocalls*, CTIA, <https://fightingrobocalls.ctia.org/>.

¹⁹ Notices and disclosures to consumers regarding caller ID-related services must comply with the FCC’s accessibility requirements for telecommunication services and advanced communication services to be accessible, usable, and compatible as specified in section 255, 716, or 718 of the Communications Act.