

**USTELECOM
INDUSTRY
TRACEBACK
GROUP**

2019 PROGRESS REPORT



USTELECOM | THE BROADBAND ASSOCIATION

MESSAGE FROM USTELECOM'S CEO



Protecting consumers from the dangers of illegal robocall scams is a top priority for USTelecom. If left unchecked, the illegal robocall epidemic will not only result in defrauded American consumers, but it will also erode the confidence of consumers and businesses that rely on our communications networks. We are simply not going to let that happen.

That's why USTelecom launched, and we are so proud to lead, the Industry Traceback Group (ITG), a coordinated industry effort to identify the source of, and bring to justice, illegal callers. Industry progress in blocking and authenticating calls is very important, but putting the illegal callers out of business altogether is our ultimate goal. 2019 was a year of amazing progress for the ITG — more tracebacks than ever before, an expanding list of participating companies, and significant coordination and collaboration with federal and state enforcement authorities, culminated by federal legislation and the adoption of anti-robocall principles by major voice service providers and every state Attorney General calling for participation in tracebacks via the ITG.

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USTelecom thanks all the innovative companies which comprise the ITG membership, as well as our many partners in government in Washington, DC and across the country for their commitment to and direct support of the ITG. And I want to thank our talented USTelecom staff for their dedication to this work and also our advisors and consultants who have worked tirelessly with us this year to build the ITG into one of our most potent

tools in the national effort to eradicate illegal robocalls. I would like in particular to acknowledge ZipDX, a provider of specialized telecom applications and a long-time advocate of the traceback process. On its own initiative ZipDX developed and made available at no charge to the ITG a web-based traceback system bringing automation and scale to our efforts, while also contributing process innovations and operational expertise. Together, we've evolved traceback into a critical pillar in the fight against illegal robocalls. As a result, we are now routinely — and rapidly — tracing back representative call examples from the most egregious illegal calling campaigns so that they can be stopped at the source. The ITG team looks forward to continuing this strategic collaboration to build on the amazing momentum and impact of the ITG.

A handwritten signature in black ink that reads "Jonathan Spalter". The signature is fluid and cursive, with a long horizontal line extending from the end.

Jonathan Spalter
CEO, USTelecom

ITG MEMBERS

PLATINUM PARTNERS

AT&T



VERIZON



COMCAST



GOLD PARTNERS

CENTURYLINK



CHARTER COMMUNICATIONS



COX COMMUNICATIONS



SPRINT



T-MOBILE



SILVER PARTNERS

CONSOLIDATED COMMUNICATIONS



FRONTIER



U.S. CELLULAR



WINDSTREAM



BRONZE PARTNERS

ANI NETWORKS



BANDWIDTH



BRIGHTLINK



BUSINESS TELECOMMUNICATIONS SERVICES



INTELIQUENT



O1 COMMUNICATIONS



BRONZE PARTNERS (cont.)

PEERLESS NETWORK



TWILIO



VOXOLOGY

VOXOLOGY

WEST TELECOM



XCAST LABS



YMAX



AFFILIATE MEMBERS

ALLIANCE GROUP SERVICES

BELL CANADA

CINCINNATI BELL

GOOGLE

HD TANDEM

IDT TELECOM

IMPACT TELECOM

SILVER STAR COMMUNICATIONS

ITG OVERVIEW

USTelecom's nationally recognized Industry Traceback Group (ITG)¹ is a collaborative effort of voice service providers from across the wireline, wireless, VoIP and cable industries that actively trace and identify the source of illegal robocalls. In 2019, the ITG had nearly 30 voice service provider members whose operations are guided by detailed written policies and procedures. The origination, delivery and termination of robocalls involves numerous voice service providers in a complex ecosystem. Over 100 entities, including many non-member service providers who cooperate when contacted, have participated in ITG tracebacks of suspected illegal robocalls to date.

The ITG's mission is to provide a neutral coordination platform for voice service providers to trace and identify the source of illegal robocalls to provide for the

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robust protection of voice networks and users of such services from fraudulent, abusive, and/or unlawful robocalls. The Communications Act permits voice providers to share customer proprietary network information (CPNI) in order to protect their customers and/or networks, enabling the ITG to quickly and efficiently identify the path of calls under investigation.²

A traceback starts with a terminating service provider possessing evidence of suspicious traffic. The ITG coordinates with voice service providers at all levels within the call path using a Secure Traceback Portal managed by USTelecom, systematically tracing calls through multiple networks until the originating voice service provider is identified (sometimes including the actual calling party) or reaching a non-responsive provider.

USTelecom, on behalf of the ITG coordinates with federal and state law enforcement agencies to identify non-cooperative providers so they can take enforcement action, as appropriate. USTelecom also maintains the government list of Do Not Originate (DNO) Numbers and works with industry to implement DNO call blocking for government agencies.

GOVERNMENT COLLABORATION AND RECOGNITION

The ITG has been recognized at all levels of government, including the Federal Communications Commission (FCC), the Federal Trade Commission (FTC), State Attorneys General, and the United States Congress. Given the crucial role of tracebacks in mitigating illegal robocalls, federal and state government enforcement agencies have strongly encouraged all voice service providers to participate in traceback efforts.

	<p>In August, all 51 State Attorneys General and 12 major voice service providers announced their shared commitment to ending illegal robocalls via the adoption of Anti-Robocall Principles, including a commitment to “allow for timely and comprehensive law enforcement efforts against illegal robocallers, dedicate sufficient resources to provide prompt and complete responses</p>
<p>In August, all 51 State Attorneys General and 12 major voice service providers announced their shared commitment to ending illegal robocalls via the adoption of Anti-Robocall Principles</p>	<p>to traceback requests from law enforcement and from USTelecom’s Industry Traceback Group.”³ USTelecom has been pleased to work directly with numerous state Attorneys General, responding to multiple subpoenas and civil investigative demands related to ITG tracebacks.</p> <p>FCC Chairman Ajit Pai publicly acknowledged that the ITG “has been particularly helpful in making sure that we quickly trace scam robocalls to their originating source” and called USTelecom an “important ally in promoting broad industry participation in these traceback efforts”.⁴ The FCC’s</p>
	<p>Enforcement Bureau has been a helpful ally in the effort to trace back illegal callers by sending letters to voice service providers that have been non-responsive to ITG traceback requests.⁵ The letters “urge” voice service providers “to cooperate with the USTelecom Industry Traceback Group’s program aimed at identifying the source of illegal robocalls and harmful spoofed calls.”</p> <p>An FTC action in June against an illegal robocaller specifically acknowledged the assistance of USTelecom, via the ITG, in bringing to justice an individual</p>
<p>FCC Chairman Ajit Pai publicly acknowledged that the ITG “has been particularly helpful in making sure that we quickly trace scam robocalls to their originating source”</p>	<p>responsible for generating millions of illegal robocalls and calls to phone numbers listed on the Do Not Call Registry, including calls using “spoofed” caller ID information.⁶</p> <p>In December, the President signed into law S.151, the Pallone-Thune TRACED Act. Congress approved this bipartisan legislation that, among other things, gives the FCC the authority to mandate the implementation of call authentication technology, increase penalties for illegal calls, and facilitates stronger enforcement efforts. Related</p>
	<p>to tracebacks, the legislation requires the FCC to register a consortium of companies engaged in private-led efforts to trace back the origin of suspected unlawful robocalls and requires a report for voice service providers that have or have not participated in a private-led effort to trace back calls.</p>

2019 ITG PROGRESS

At the beginning of 2019, a secure web-based portal was established to semi-automate the traceback process, resulting in a significant increase in traceback volume and reducing the time it takes to conduct a traceback. In 2018, USTelecom conducted approximately 20 tracebacks per month; in 2019 the average was approximately 110 per month, representing robocall campaigns responsible for tens of millions of illegal calls. The time it now takes to trace back illegal robocalls to the source has been reduced from weeks to days — sometimes even hours. More than just increasing the total volume, the ITG got smarter about how it identifies

In 2019, USTelecom average monthly tracebacks **INCREASED 550%**

In many cases, we know within hours the provider responsible for initiating suspicious traffic, and sometimes the calling party, and also where a robocall entered the US network

which calls to trace back. In addition to individual traceback requests from government agencies and ITG members, USTelecom, in collaboration with YouMail (a consumer-facing robocall blocking service), is now identifying the most prolific calling campaigns and focusing tracebacks on the highest volume national robocall scams.

In 2019, USTelecom increased engagement with non-ITG members and significantly decreased the amount of non-responsive service providers within the US by establishing improved outreach and coordination processes. In many

cases, we know within hours the provider responsible for initiating suspicious traffic, and sometimes the calling party, and also where a robocall entered the US network. Patterns have emerged showing on-going sources of illegal robocalls. This information is shared with government enforcement agencies and ITG members who can make informed decisions about the traffic they carry over their networks. Taking advantage of this information, thought-leading voice service providers have begun to modify contracts to incorporate traceback amendments and engaging with upstream voice service providers to halt illegal traffic.

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Our process has adapted, and will continue to do so, as the robocalling scourge evolves. USTelecom has substantially updated and improved, and continues to do so, formal ITG Policies and Procedures. In particular, our process has evolved to focus on established clear and measurable metrics to identify “non-cooperative” voice service providers. USTelecom and ITG members have also made significant strides in sharing traceback results and other information

with enforcement authorities including via a Robocall Enforcement ListServ where traceback referrals are simultaneously shared with federal and state law enforcement partners to ensure government agency coordination. Over 20 subpoenas/civil investigative demands from federal and state enforcement

agencies were received in 2019. The ITG is tracking down more illegal robocallers faster than ever before, and helping to bring them to justice.

TRACEBACKS 2020

2019 was a year of significant progress for the ITG, but much more needs to be done. 2020 will build on that progress with industry and government making concerted mitigation efforts to combat the scourge of fraudulent and illegal robocalls. As more voice service providers participate in tracebacks and take steps to address the illegal traffic on their networks, fraudsters and scammers will attempt to shift routes. Through timely sharing of traceback findings with industry and government enforcement, all can be aware of and take steps to combat illegal robocall sources traversing our networks.

ENDNOTES

1 See The USTelecom Industry Traceback Group (ITG), What Is the Industry Traceback Group, available at, <https://www.ustelecom.org/the-ustelecom-industry-traceback-group-itg/> (last visited Jan. 3, 2020).

2 Section 222(d)(2) of the Communications Act permits telecommunications carriers to share, disclose and/or permit access to, CPNI in order to “protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.” 47 U.S.C. § 222(d)(2).

3 See Anti-Robocall Principles, available at <https://www.ustelecom.org/anti-robocall-principles/> (last visited Jan. 3, 2020).

4 See Remarks from Ajit Pai, Chairman, FCC, USTelecom Forum: Turning the Tide on Illegal Robocalls (June 11, 2019), available at <https://docs.fcc.gov/public/attachments/DOC-357911A1.pdf>.

5 See, Letter from Rosemary C. Harold, Chief, Enforcement Bureau, FCC, and Eric Burger, Chief Technology Officer, FCC, to Jonathan Spalter, President & CEO, USTelecom — The Broadband Association (Nov. 6, 2018), available at <https://docs.fcc.gov/public/attachments/DOC-354942A2.pdf> (last visited Jan. 3, 2020).

6 See Press Release, FTC, FTC Crackdown Stops Operations Responsible for Billions of Illegal Robocalls, (rel. March 26, 2019), available at <https://www.ftc.gov/news-events/press-releases/2019/03/ftc-crackdown-stops-operations-responsible-billions-illegal> (last visited Jan. 3, 2020).