

Guidelines for U.S. Law Enforcement Traceback Requests

Last Revised September 2, 2020

The Industry Traceback Group (ITG), led by USTelecom and designated by the Federal Communications Commission as the official U.S. Traceback Consortium, is a collaborative effort of companies across the wireline, wireless, VoIP and cable industries that actively trace and identify the source of illegal robocalls. The ITG is committed to working hand-in-hand with federal and state law enforcement agencies to identify the parties responsible for illegal robocalls and to stop such traffic. Information about the ITG and the traceback process, including the ITG Policies and Procedures, are available at <https://www.ustelecom.org/the-ustelecom-industry-traceback-group-itg>.

These Guidelines provide guidance about submitting traceback requests with all necessary information. **Please note that the ITG cannot guarantee that it will conduct any or every traceback requested of it.**

Traceback Prioritization

Using data from a variety of sources consistent with its Policies and Procedures – including from law enforcement partners – the ITG targets ongoing high-impact and/or high-volume illegal robocalling campaigns. The ITG also seeks to prioritize tracebacks in support of specific current or planned enforcement action. Traceback requests with call examples less than ten days old are prioritized as they are most likely to result in successful completion.

The majority of tracebacks involve ongoing illegal robocall campaigns. Focusing on current campaigns offers two key advantages. First, focusing resources on ongoing campaigns, rather than prior defunct ones, enables participating voice service providers to take affirmative action to stop those ongoing campaigns. Second, voice service providers are less likely to have records related to older illegal robocalls, based on their routine data retention and minimization practices. The more recent the data, the more likely the ITG can successfully trace back the illegal robocall to its source.

Submitting a Traceback Request

The ITG has provided a standard USTelecom ITG Traceback Request Form to ensure that the ITG traceback team receives the data necessary to conduct a traceback. The traceback process is entirely dependent on complete and accurate data inputs. **An incomplete certification or missing or inaccurate data will preclude the ITG from conducting a requested traceback.**

- **Certification.** The Request Form requires a certification that, among other things, the individual submitting the request has direct knowledge that the requested tracebacks relate to calls that are suspected of being in violation of state and/or federal law. The certifying individual therefore should have a clear and particular basis to believe the calls are illegal, and should provide that basis in the Request Form. Importantly, not all robocalls are illegal, including those made with consent. For that reason, the ITG recommends confirming with call recipients, especially in telemarketing and debt collection contexts, that they did not consent to the calls.
- **Complete and Accurate Call Data.** A traceback is not possible without certain critical data. Tracebacks must have the phone number of the receiving party, as well as the date and time the party received the call in Coordinated Universal Time (UTC), also known as Greenwich Mean Time. The Request Form also asks for the number that an illegal robocall purports to be from, even if potentially spoofed. This information is important to better understand a given illegal robocalling campaign. We request that the calls be associated with a particular campaign which

is up to the requestor to name and describe. Finally, the purpose of the request for each call is helpful for the ITG traceback team for prioritization purposes.

- ***Recording or Transcript.*** Providing a recording, or accurate transcript, of the prerecorded message from the illegal robocall is ideal, but not required. Many illegal calling campaigns are similar, but ultimately come from different sources. Recordings and transcripts can help the traceback team ensure accurate traceback results. They also can provide important evidence of the illegality of a robocall, which provides the ITG a strong legal basis to run the traceback. Such recordings can be related to the specific call in question or a sample obtained from an alternative source that is consistent with the call in question.

Working with the ITG Traceback Team

The ITG routinely traces back the most prolific ongoing campaigns of illegal robocalls, and may already be tracing back a particular illegal robocalling campaign of interest. Therefore, before submitting a traceback request, please feel free to reach out to the ITG's traceback team. Please also contact the team with any questions about the process or the form at traceback-request@ustelecom.org.