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Tim Marvin  
Consumers Union  
1535 Mission Street  
San Francisco, CA 94103-2512

Dear Mr. Marvin:

Thank you for your recent letter to Verizon Chairman and CEO Lowell McAdam about the problem of illegal robocalls. Verizon agrees that robocalls are an important issue. While we are taking a number of steps to help combat this problem, we agree that more needs to be done to help ensure consumers are aware of the ways they can help guard against these unwanted calls. As you discussed with my team, we all need to work together to help combat illegal robocalls. As a well-respected resource with a broad consumer audience, we believe Consumers Union can play a critical role in educating consumers about the various commercially-available options consumers can use to help protect themselves against robocalls. We are happy to discuss ways we can assist your consumer awareness efforts.

This is an area where we share a common interest. Robocalls burden our customers and potentially reduce the value of the service we provide. They also affect the reliability of both wireline and wireless networks because mass calling events can overwhelm switches, causing legitimate customers to be unable to complete calls. Addressing robocalls requires significant time and resources from our customer care and fraud teams, which address complaints about abusive telemarketing and other scams perpetrated by robocallers. Our network engineers also continuously monitor the network for suspicious calls, investigate their origins, and work with law enforcement agencies and with other companies to shut down the sources of illegal calls. Although Verizon works hard to identify and shut down illegal robocalls by investigating suspicious call patterns, currently there is no way for a communications provider to ensure that a network-based blocking solution will not accidentally block a legitimate robocall, such as a school closing or public safety announcement.

Obviously, the most direct way to address this problem is to target the bad actors that actually generate the millions of unwanted and often-illegal calls that annoy, harass, and sometimes defraud our customers. Fortunately, efforts are underway in Congress to address the robocalls problem, and we are committed to working with Congress to shape federal legislation that targets those parties generating robocalls and closes loopholes in existing laws. We are also working to solve the robocall problem by developing new technologies and working closely with other stakeholders. Some of the forums in which we participate, such as the Internet Engineering Task Force, focus on longer-term technical solutions, such as “authentication” protocols designed to facilitate blocking solutions that distinguish between wanted and unwanted robocalls. Others, such

as the Messaging, Malware and Mobile Anti-Abuse Working Group and the Alliance for Telecommunications Industry Solutions, are working on identifying best practices and developing new mitigation techniques that all stakeholders, including communications providers as well as third party solution providers, can use to better address illegal robocalls.

While no existing solution is a panacea – and some pose risks of unintended consequences – there are a wide variety of anti-robocall products currently on the market that consumers could clearly benefit from. Educating consumers about robocalls would go a long way toward ensuring they are aware of the various options available to guard against unwanted calls. Your “EndRobocalls” campaign is a helpful step in that direction. We believe consumers would also benefit from Consumers Union publishing an informative third-party product evaluation, for which Consumers Union is well known, for these products.

Consumers deserve an “all of the above” strategy to the robocall problems. Industry, law enforcement and consumer groups can work together to tackle this issue by educating consumers about available tools, utilizing existing mitigation techniques, and redoubling efforts already underway to develop longer-term IP-based solutions. Verizon looks forward to working with you on this important issue.

Sincerely,

A handwritten signature in blue ink that reads "Donna Epps". The signature is written in a cursive style.

cc: Ellen Bloom, Senior Director of Federal Policy, Consumers Union