



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97

**Reply Comments of the American Consumer Institute**

The American Consumer Institute Center for Citizen Research (ACI) is a nonprofit (501c3) educational and research institute with the mission to identify, analyze and project the interests of consumers in selected legislative and rulemaking proceedings in information technology, health care, insurance, energy, and other matters.

ACI submits these comments in response to the Public Notice (“Public Notice”) released by the Consumer and Governmental Affairs Bureau (“Bureau”) of the Federal Communications Commission (“Commission”) in the above-referenced dockets.<sup>1</sup> Through the Public Notice, the Bureau solicits input for a staff report (“Report”) on call blocking as required by the Commission’s Call Blocking Declaratory Ruling and Third Further Notice of Proposed Rulemaking released last year.<sup>2</sup>

ACI appreciates the opportunity to submit reply comments to the Commission for a Report on call blocking and commends the Commission’s efforts to curb illegal calls. It is, however, critical that calls from legitimate businesses to their customers not be blocked. Currently, several calling entities, including from the public health and safety sectors and legitimate financial institutions, are reporting increased levels of blocked or mislabeled calls. As such, we urge the Commission to move cautiously and ensure that the proposed framework allows legitimate calls to be completed.

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<sup>1</sup> Advanced Methods to Target and Eliminate Unlawful Robocalls, Public Notice, DA 19-1312, CGB Dec. 20, 2019.

<sup>2</sup> See Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor, CG Docket No. 17-59, WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, FCC 19-51. rel. June 7, 2019.

Scams and illegal robocall make up an estimated 40 percent of all robocalls.<sup>3</sup> Unfortunately, the increasing frequency in robocalls has made Americans wary of picking up their phones. The robocall issue has become so bothersome that about 10 percent of legitimate telephone calls are blocked; this can have severe repercussions.<sup>4</sup>

Not distinguishing between the useful and legal robocalls and the illegal robocalls could cause major problems for consumers, businesses with legitimate uses for robocalls, and ultimately on how enforcement agencies and wireless providers deal with the issue.

Recent research exemplifies the negative consequences of financial institutions being unable to communicate effectively with their customers.<sup>5</sup> Specifically, evidence shows that among those customers entering collections (1-29 days past due), reducing the number of calls could increase the number of those customers who end up 90+ days past due by nearly 70% for installment loans and over 50% for vehicle finance contracts.<sup>6</sup> While this is a problem for financial institutions who need to reach their customers, it's even more of a problem for the customers who are missing calls reminding them to make payments, alerting them to fraud on their accounts, notifying them that their vehicle is at risk of repossession, etc.

Other negative repercussions of blocking legitimate calls include missing important information from healthcare providers, missing a severe weather alert, or even a safety warning about an imminent danger. There is no doubt that robocalls are a growing issue that requires urgent scalable solutions. But as we go through workable solutions, we urge the Commission to be more surgical in their efforts and consider the concerns discussed above.

ACI appreciates the opportunity to comment on this Public Notice and supports the Commission's effort to gather feedback on the effectiveness of the current call blocking efforts.

Respectfully,

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<sup>3</sup> <https://www.cnbc.com/2019/01/02/as-robo-calling-ramps-up-consumers-increasingly-wonder-why-carriers-cant-stop-scammers-from-spoofing-their-phone-numbers.html>.

<sup>4</sup> <https://www.usatoday.com/story/tech/2019/08/29/blocking-robocall-scams-real-phone-calls-get-blocked-too/2149516001/>.

<sup>5</sup> CenturyLink and American Financial Services Association, "Impact of Call Restrictions on Consumer Delinquencies in Vehicle Finance and Installment Lending." November 2019. Available at: <https://www.afsaonline.org/Portals/0/11AFSA%20-%20Impact%20of%20Collections%20Call%20Restrictions%20-%20Nov%202019%20FINAL.pdf>.

<sup>6</sup> Ibid.