

June 11, 2019

Via Electronic Submission

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Pai:

The Electronic Transactions Association (ETA) submits these comments in response to the Federal Communications Commission's (FCC) summit focused on the telecommunications industry implementation of SHAKEN/STIR – the caller ID authentication framework to combat illegal robocalls and caller ID spoofing.

ETA is the leading trade association for the payments industry, representing over 500 companies that offer electronic transaction processing products and services; its membership spans the breadth of the payments industry to include independent sales organizations, payments networks, financial institutions, transaction processors, mobile payments products and services, payments technologies, equipment suppliers, and online small business lenders.

ETA applauds and supports the FCC's efforts to combat unwanted and illegal robocalls. Unwanted and illegal robocalls are a nuisance, or even worse, predatory, for many consumers, and efforts to detect and eliminate these calls are important for consumer protection. Robocalls made with the intent to defraud consumers, (e.g. the IRS scams), damage the trusted communication channels between customers and businesses.

At the same time, there is a category of phone calls that are legitimate and serve valuable goals. For example, financial institutions have legitimate business purpose to call their customers to combat credit card fraud in the payments industry. When suspicious credit card activity is detected, ETA members call the customer's mobile phones to help verify the legitimacy of the transactions in question. Thieves move quickly, so real-time communication between a financial institution and its customers is essential to stopping the criminal activity. This invaluable tool plays a significant role in curtailing multi-billion-dollar annual fraud activity in the U.S.

ETA asks the FCC to continue to differentiate between unwanted and unwanted and illegal telemarketing calls from legitimate calls between businesses with their existing customers, and to craft policies with both types of calls in mind.

On a parallel track, the ETA members are hard at work doing their part to fight unwanted and illegal robot calls by developing and deploying solutions, such as the SHAKEN/STIR framework.

The SHAKEN/STIR framework is an invaluable tool in the effort to fight unwanted and illegal robocalls. SHAKEN/STIR provides consumers with an icon that lets the consumer know the probability that an incoming call is fraudulent or not. This rating system arms the consumer with information about whether to the call is

more likely an unwanted call or is a legitimate call, say from financial institutions with whom they have an existing relationship. SHAKEN/STIR is an additional part of the overall effort to fight unwanted and illegal robocalls, while still distinguishing legitimate calls.

ETA applauds and supports the FCC's interest in and pursuit of solutions to combat unwanted and illegal robocalls. We look forward to continuing to work with the FCC and other stakeholders to find reasonable solutions to achieve this important consumer protection goal. If you have any questions, please feel free to contact me directly at stalbott@electran.org.

Sincerely,



Scott Talbott
Senior Vice President of Government Affairs
Electronic Transactions Association