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October 5, 2021

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

**RE: CG DOCKET NO. 17-59 - Advanced Methods to Target and Eliminate
Unlawful Robocalls**

Dear Ms. Dortch:

The Voice on the Net Coalition (“VON”)¹, by counsel, hereby responds to correspondence² concerning the Commission requirement adopted in the Fourth Report and Order in this docket that voice service providers notify callers when calls are blocked. Specifically, the Commission required that blocked callers be notified using SIP codes 607 (for unwanted calls) and 608 (calls rejected by an intermediary such as an analytics engine).³ This requirement provided a reasonable balance between the Commission’s goal of reducing the number of illegal robocalls by permitting analytics-based blocking and ensuring effective redress

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP-enabled communications, including interconnected Voice over Internet Protocol (“VoIP”). For more information, see www.von.org.

² See Ex Parte Notice of USTelecom, CG Docket No. 17-59 (July 27, 2021); Ex Parte Notice of Transaction Network Services, Inc. CG Docket No. 17-59 (August 26, 2021).

³ See Advanced Methods to Target and Eliminate Unlawful Robocalls, Fourth Report and Order, 35 FCC Rcd 15221 (2020) ¶¶ 56-60 (“Fourth Report and Order”).

mechanisms were available for those calls that may have been wrongfully blocked by those same analytics. The requirement is to take effect on January 1, 2022.⁴

USTelecom is now recommending that the Commission permit the use of SIP Code 603 (or other appropriate response code to the extent such code has been operationalized through an appropriate telecommunications industry body such as the ATIS/SIP Forum IP-NNI Task Force), which USTelecom claims is the only available option to implement a return code in the (undefined) “short term” and that is mapped to ISUP Code 21.⁵ USTelecom is suggesting that it could take months, or even years, for industry to deploy the SIP 607 and 608 codes as it will need to first finalize and operationalize the standards and for vendors to implement the final standards in their equipment and providers to make changes to their networks. In contrast, according to USTelecom, SIP Code 603 will provide callers the information needed to identify the terminating providers associated with the called numbers and begin the redress process.⁶

Throughout these proceedings, VON has supported Commission and industry efforts to substantially reduce the volume of illegal robocalls while advocating for a redress mechanism for those calls that may have been wrongfully blocked.⁷ To that end, VON has a number of concerns with industry adoption of SIP Code 603:

- **603 would not produce significant savings.** SIP Code 603 is not adequate for heuristic-sourced blocking (e.g., what SIP Code 608 would be used for) but is generally used to convey that the call was blocked or rejected by the called party (possibly by using

⁴ Id. at ¶ 61.

⁵ USTelecom Ex Parte at 1, 4. USTelecom has also filed a Petition for Reconsideration asking the Commission to reconsider the requirement that providers that block calls on an IP network return SIP Code 607 or 608, alleging the standard the Commission relied on to impose the requirement was not fully vetted. Petition for Reconsideration and Request for Clarification of USTelecom – The Broadband Association, CG Docket No. 17-59 (filed May 6, 2021).

⁶ USTelecom Ex Parte at 2.

⁷ Comments of the Voice on the Net Coalition, CG Docket No. 17-59 (August 31, 2020). More recently VON members participated on a USTelecom-led Blocking and Labeling Working Group determining best practices to redress wrongfully blocked calls. See [Best Practices Relating to Redress Requests – USTelecom](#) (last visited October 5, 2021).

functionality on the handset) rather than, for example, an analytics engine.⁸ US Telecom may not be wrong about the cost and timelines of implementing new codes, but overhauling SIP Code 603 would not produce significant savings.

- ***603 won't save you time if you intend for it to be meaningful.*** SIP Codes 607/608 were required because they would let the originating carrier know a call was blocked and would provide information about the basis for the block and the blocking carrier that could be used in resolving disputes. It was, in essence, a method of remediating the problem of poor analytics and over-blocking of calls that can undermine the reliability of the public switched telephone network. SIP Code 603 would be clumsy, at best. If SIP Code 603 were modified (e.g., overloaded with a blocking reason header/cause code that included a contact url) to provide the sort of information needed to resolve disputed blocked calls, that reworking would require industry agreement and retooling of current practices, and would likely introduce the same delay USTelecom is trying to avoid with SIP Codes 607/608. Additionally, US Telecom's recommendation for originating providers to use analytics to determine if SIP Code 603 responses are actionable for redress would increase redress requests thereby overburdening analytics and terminating providers with unactionable requests instead of receiving and correcting valid redress requests stemming from SIP Code 608 responses.

Rather than adopt the USTelecom proposal, the Commission should instead require industry, and the applicable standards organizations to expeditiously resolve by a specific deadline any outstanding technical issues that will impede the use of SIP Codes 607 and 608 by January 1, 2022. Barring that, the Commission should delay its decision permitting voice service providers to block calls based on analytics (produced by either the voice service provider or a third-party blocking service) until the appropriate blocking notification has been approved and implemented by service providers and equipment vendors. Without such result, the Commission's stated goal of providing a balance between blocking and redress will be frustrated; creating additional confusion for consumers as the industry begins to implement STIR/SHAKEN.⁹

⁸ See .e.g. <https://www.zoiper.com/en/support/home/article/71/SIP%20603%20-%20Declined>; <https://knowledgebase-iframe.polycom.com/kb/viewContent.do?externalId=12645>; https://www.websitepulse.com/kb/sip_response_status_codes (last visited October 5, 2021).

⁹ See also, Comments of the Voice on the Net Coalition, CG docket 17-59 (June 4, 2021) (responding to the USTelecom Petition for Reconsideration).

Ms. Marlene Dortch
October 5, 2021

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

By: _____/s/_____

Glenn S. Richards
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