January 14, 2019

Hon. Jessica Rosenworcel  
Commissioner  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC  20554  
jessica.rosenworcel@fcc.gov

Dear Commissioner Rosenworcel:

I am pleased to answer your December 12 letter about CenturyLink’s tools to help consumers reduce annoying and unlawful calls. We share your concern about illegal robocalling and the frauds and scams commonly associated with it.

Low-cost Internet based calling platforms have led to large scale robocalling campaigns, worsened by increasingly sophisticated Caller ID spoofing that makes calls appear more credible and that make it difficult to pursue or block fraudsters. Perhaps the worst robocalling offenders are overseas, in markets not noted for respecting consumers or U.S. laws.

Unwanted calls annoy us all. They harm consumers and diminish trust in voice service. That is why CenturyLink has been working with industry and trade associations on new industry technology to reduce the problem through a variety of means. New call authentication technology promises to help industry reduce illegal robocalls, increase confidence in Caller ID, and make it easier to identify suspect calls and trace back illegal ones. Where technically feasible, SHAKEN/STIR is being rolled out broadly by the industry in 2019, including CenturyLink. In the meantime, existing consumer tools can help reduce unwanted calls.

CenturyLink offers a variety of tools to help our customers control who can reach them. Even with growth in spoofing, Caller ID can help consumers recognize and decline to answer suspicious calls. Caller ID with Privacy+ blocks calls that lack Caller ID information unless the caller provides a name. Anonymous Call Rejection blocks calls from “private” or anonymous numbers. Call Rejection and Enhanced Call Rejection block calls from specific numbers. Do
Not Disturb and Call Curfew block all incoming calls during specified hours. CenturyLink also offers a Call Trace service for harassing or disturbing calls.

Our call screening tools are even more effective against robocallers. CenturyLink’s innovative No Solicitation services plays an automated message asking solicitors to hang up and telling legitimate callers to press a specific key. Otherwise, the call never rings through to the customer and instead is forwarded to voice mail. CenturyLink’s Security Screen requires callers from blocked, unidentified, toll-free or long distance numbers to enter their ten digit telephone numbers before their call will connect to the customer. Although No Solicitation and Security Screen services do not actually block robocalls, our experience shows they dramatically reduce unwanted calls by frustrating automated platforms and discouraging live robocalling operators. These call screening tools are among our most popular features, which reflects their high level of practical effectiveness.

These calling features are available today at no additional cost with most home or business phone bundles. For basic phone customers without bundled service – who represent a small fraction of voice accounts – a modest monthly fee applies, with pricing varying by location. Availability also varies by state and by local operating company based on local network. I am enclosing a list of current tools and their typical cost.

CenturyLink is also evaluating new features that will make use of Call Authentication signaling enabled by the 2019 rollout of the new SHAKEN/STIR technology. For Internet Protocol and TDM network, CenturyLink engineers are evaluating options to enhance our customer tools, notably by supplementing Caller ID displays based on Call Authentication. This should provide consumers with greater confidence in the calls they may receive. Although there are challenges with authentication for calls involving networks based on Time Division Multiplexing, there are potential solutions that may enable many IP-originated inbound calls to be recognized as authenticated.

We are also looking at new uses of data analytics in conjunction with SHAKEN/STIR for new network blocking and consumer blocking and screening options. Vendors are rapidly developing new products and services, and CenturyLink is evaluating new tools to add to its network with the 2019 rollout of the new technology. Additionally, SHAKEN/STIR will enable CenturyLink and allied providers to enhance the speed and effectiveness of their Trace Back initiative, which works to identify originators of unlawful robocalls.

CenturyLink is doing its part to help address the difficult problem of illegal robocalls. Our consumer tools can help, and we encourage customers to use them to help reduce unwanted calls.

Sincerely,

[Signature]

encl.
BLOCKING & SCREENING TOOLS

CenturyLink’s website provides tips on how to reduce unwanted calls, as well as detailed information about tools that can be used to block or filter calls. The website describes each feature, how it can be used, and how it can be effective. Availability of particular calling features varies depending on local network. Additional tools are under review based on new Caller ID authentication technology being deployed across the industry in 2019.

Ways to block unwanted calls from your home phone.

How to use calling features to block incoming calls.
http://www.centurylink.com/help/?assetid=233

Caller ID

Caller ID helps customers recognize unfamiliar callers that they may not want to answer. Consumers utilize Caller ID routinely to screen inbound calls and avoid suspected robocallers.

The service is included for customers with a Home Phone or Small Business bundle at no additional cost. For Basic Phone customers with local service, a monthly fee of $6 to $10 applies.

Security Screen

Security Screen blocks calls from blocked, unidentified, toll-free, or long distance calls unless the caller provides a number. This feature is highly effective at frustrating most robocallers and avoiding the annoyance of answering.

This feature is included for customers with a Home Phone or Small Business bundle at no additional cost. For Basic Phone customers with local service, there is a $2.95 monthly fee.
**Caller ID with Privacy+**

*Caller ID with Privacy+* blocks calls that lack Caller ID information, unless the caller provides a name. The customer can hear the name and decide to accept or decline the call. The screening step can frustrate many automated robocalling platforms and reduce the annoyance of answering unwanted calls. This optional service is available to all customers at a $2.95 monthly fee.

**Call Rejection/Enhanced Call Rejection**

*Call Rejection* blocks up to 15 unwanted numbers selected by the customer. This feature can help block repeats of unwanted calls, although it is not effective against robocallers that falsify and repeatedly change their Caller ID. It is included for customers with a Home Phone or Small Business bundle at no additional cost. For Basic Phone customers with local service, there is a $6 monthly fee.

*Enhanced Call Rejection* blocks up to 25 unwanted numbers. It is included for customers with a Home Phone or Small Business bundle. For Basic Phone customers with local service, it is $6 per month.

**Anonymous Call Rejection**

*Anonymous Call Rejection* blocks calls that lack Caller ID information, such as “private” numbers. It is effective against robocallers that block their originating number, but not against those that falsify their originating number. It is included for customers with a Home Phone or small business bundle at no additional cost. For Basic Phone customers with local service, it is offered at no additional charge with *Caller ID* service.
No Solicitation

No Solicitation intercepts and plays a recording to callers, directing telemarketers to hang up. Other callers may press “1” to have the call connected. This feature is highly effective at frustrating most robocallers. This feature is included for customers with a Home Phone or Small Business bundle at no additional cost. For Basic Phone customers with local service, there is a $6.95 monthly fee.

Do Not Disturb/Call Curfew

Do Not Disturb stops all incoming calls when activated. Call Curfew stops all calls (incoming and outgoing) during periods the customer chooses. These tools can prevent the annoyance of unwanted calls at specific times, although they do not specifically target robocalls. These features are included for customers with a Home Phone or Small business bundle at no additional cost. For Basic Phone customers with local service, there is a $3.95 monthly fee.

Call Trace

Call Trace allows consumers to report harassing or disturbing calls. After three traces, CenturyLink will take further action on request. For all customers, there is a charge of up to $5 per use. There is no charge for unsuccessful traces.

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Notes:

Charges vary by state and local operating company and may be somewhat lower in some locations. For Basic Phone customers, a one-time set-up fee may apply, which will vary by state and local operating company. Feature availability varies by local operating company.

Caller ID service and related features may be unavailable for technical reasons in a very small number of CenturyLink exchanges.