

May 29, 2019

Via ECFS

Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59;
Call Authentication Trust Anchor, CG Docket No. 17-97

Dear Ms. Dortch:

The undersigned are small and medium-sized competitive providers of interconnected VoIP and other voice services, many serving smaller markets and rural areas. We write today in support of the public draft Declaratory Ruling issued in the above-captioned proceeding, which would affirm that voice providers may offer robocall blocking tools to new or existing customers on an informed opt-out basis. The Commission's adoption of this Declaratory Ruling would empower providers like us, including other members of ACA Connects — America's Communications Association, to do more to shield our customers from the ceaseless torrent of robocalls.

There are effective tools available today that block robocalls before they reach the customer. As smaller providers, we partner with third parties to provide their tools to our customers on an opt-in basis at no cost. However, in our experience, notwithstanding our efforts to inform our customers of the significant benefits of these tools, relatively few customers take the affirmative step of signing up for them. These low opt-in rates persist in spite of consumers' growing frustration with robocalls. And the feedback we've received from "early adopters" of robocall blocking tools has been overwhelmingly positive, which makes it unfortunate that customers who are less familiar with and slower to adopt new technologies are missing out.

We could help more of our customers enjoy the benefits of free robocall blocking if we offered these tools on an informed opt-out basis, as the Declaratory Ruling contemplates. Given the popularity of these tools among customers that use them, we anticipate that opt-out rates would be low—and thus, many more of our customers would receive the benefit of these tools than do today. The result would be a significant net improvement in our customers' user experience. And the more widely our customers use these tools, the better these tools can help us differentiate our voice offerings in today's highly competitive marketplace.

We applaud the Commission for making the fight against robocalls its top consumer protection priority. A core principle that has guided the Commission in this fight is that consumers have the right to block calls they do not want. By approving the Declaratory Ruling, the Commission would make abundantly clear that voice providers can help their customers protect themselves from unwanted calls by offering free robocall blocking tools on an informed opt-out basis. Doing so would encourage providers like us to share these

tools more widely with our customers, while preserving each customer's right to make an informed choice. The end result would be a major win for consumers.

Respectfully,

_____/s/_____
Jonathan Bullock
VP, Corporate Development and Government
Hotwire Communications

_____/s/_____
Joe Canavan
Chief Operating Officer
Blue Stream

_____/s/_____
Michael Candelaria
General Manager/CEO
Mid-Rivers Communications

_____/s/_____
Katherine Gessner
President
MCTV

_____/s/_____
Lee Haefele
President
Haefele Connect

_____/s/_____
Tara Kelley
SVP, White Label
Momentum Telecom

_____/s/_____
Travis Kohlrus
VP, Broadband
Eagle Communications, Inc.

_____/s/_____
Robert M. Wieand
Chief Financial Officer
Service Electric Cablevision

cc: The Honorable Ajit Pai
The Honorable Michael O'Rielly
The Honorable Brendan Carr
The Honorable Jessica Rosenworcel
The Honorable Geoffrey Starks