



Patrick R. Fucik
National Director,
State Legislative Affairs
913-687-5548

6450 Sprint Parkway
KSOPHN0314-3B221
Overland Park, KS 66251
patrick.r.fucik@sprint.com

Written Testimony of Patrick Fucik on behalf of Sprint
On Kansas HB 2620
Kansas House Energy, Utilities and Telecommunications Committee
February 18, 2020

Chairman Seiwert and members of the House Energy, Utilities and Telecommunications Committee:

Thank you for the opportunity to provide written testimony on HB 2620. Sprint is taking a neutral position on HB 2620 but we have several concerns with the bill. Sprint and the entire wireless industry has been working to combat robocalls, which include caller ID spoofing. For those who may not know, caller ID ‘spoofing’ is the practice of causing the telephone network to indicate to the receiver of a call that the originator of the call is a station other than the true originating station. This can lead to a caller ID display showing a phone number different from that of the telephone from which the call was placed.

The recently passed Federal TRACED Act sets in motion robust regulation and state engagement by mandating a call authentication program called STIR/SHAKEN and has tasked the Federal Communications Commission to implement new regulations, including a rulemaking to protect consumers from spoofed calls. Engagement on enforcement, best practices, and consumer protection is vital. At the State level, activities to address robocall and spoofing include a multi-state Attorney General robocall working group and anti-robocall principles for voice service providers.

Because of this current activity, Sprint does not believe that HB 2620 is necessary and has the following concerns:

1. The bill uses the terms “person” and “entity” but does not define these terms; and
2. The focus of the bill is to go after ‘app developers’ but does not include any language that would exempt wireless carriers from liability. This type of limited liability has been included in other state bills that have been enacted including Nebraska – see the following link:
<https://www.nebraskalegislature.gov/FloorDocs/106/PDF/Slip/LB693.pdf>

Additional Information on Sprint’s efforts to combat robocalling and spoofing:

While all carriers compete fiercely in the marketplace, we all agree that the industry-wide plague of robocalls and scammers must be tackled arm-in-arm with other carriers as we put the latest technology to work to help protect our customers. Sprint recently announced that we are teaming up with T-Mobile to deliver STIR/SHAKEN number-verification across networks, an important step in the industry’s ongoing fight against unwanted scam and spam calls. The new anti-robocalling feature is currently rolling out to T-Mobile and Sprint customers and will give customers peace of mind that calls from the Sprint network to the T-Mobile network (and vice versa) are really coming from the number listed on their caller ID display and are not being spoofed. STIR/SHAKEN is one tool among many that Sprint is utilizing in a multi-year anti-robocalling development program to improve our customers’ experience.

In addition to working with T-Mobile, Sprint recently announced a similar arrangement with Comcast.

Information about both of these announcements can be found at the following links:

<https://newsroom.sprint.com/sprint-and-t-mobile-work-together-to-protect-customers-from-scam-calls.htm>

<https://newsroom.sprint.com/sprint-and-comcast-start-rollout-anti-robocall-technology.htm>

The following is an update on Sprint's anti-robocalling principles:

Principle #1. Offer Free Call Blocking and Labeling. Sprint recently introduced a new spam detection and blocking application called Call Screener. Call Screener replaces Sprint's previous anti-robocall service called Premium Caller ID. Call Screener is installed by default on new Android devices and is available for voluntary download on iOS devices. Sprint and its analytics partner, Transaction Network Services ("TNS"), offer Call Screener Basic free of charge. It allows Sprint customers to identify and block calls determined by TNS to be high risk. Blocked calls are sent to voicemail, so a legitimate caller that is inaccurately categorized as high risk still has the opportunity to leave a voicemail for the customer if the customer has activated voicemail.

Principle #2. Implement STIR/SHAKEN call authentication. In 2019, Sprint deployed STIR/SHAKEN functionality in its network equipment and began testing with other carriers. So far in 2020, Sprint has undertaken full-scale cross-network STIR/SHAKEN deployment with two major carriers and expects to have STIR/SHAKEN on all calls with those carriers soon. Sprint is ready to test with several additional major carriers that have indicated readiness and will begin testing with others once they indicate their readiness to test with Sprint.

Principle #3. Analyze and Monitor Network Traffic. Analyze high-volume voice network traffic to identify and monitor patterns consistent with robocalls. Sprint monitors its network for suspicious and fraudulent activity and works with U.S. Telecom's Industry Traceback Group to share information and identify illegal robocallers. Sprint is evaluating additional measures it can take to enhance its capabilities to detect and block robocalls.

Principle #4. Investigate Suspicious Calls and Calling Patterns. Sprint is an active partner with the Federal Communications Commission, Federal Trade Commission, and the Industry Traceback Group to investigate suspicious calls, whether flagged by Sprint customers or flagged by other entities seeking information from Sprint.

Principle #5. Confirm the Identity of Commercial Customers. Sprint routinely gathers information regarding the identity of commercial customers.

Principle #6. Require Traceback Cooperation in Contracts. The vast majority of Sprint's traffic is already exchanged with carriers participating in robocall traceback through U.S. Telecom's Industry Traceback Group and with other carriers that have agreed to the Anti-Robocall Principles. Sprint encourages its other traffic exchange partners to participate in traceback and will work to include traceback requirements in future agreements with other traffic exchange partners.

Principle #7. Cooperate in Traceback Investigations. Sprint has been an active leader in industry traceback efforts for several years. Sprint is a Gold sponsor of the U.S. Telecom Industry Traceback

Sprint Testimony on KS HB 2620
February 18, 2020
Page 3

Group. Sprint actively participates in coordinating tracebacks and performing tracebacks for calls that traverse the Sprint network.

Principle #8. Communicate with State Attorneys General. Sprint has worked with state attorneys general on a one-on-one basis and in industry meetings to provide assistance in the state efforts against illegal robocalls. Sprint is committed to continuing to do so.

Sprint is continually working to protect our customers in the area of robocalls and spoofing and more information about these practices can be found at:

<https://www.sprint.com/en/shop/services/screener.html?INTNAV=Newsroom:CallScreener>

Thank you for your consideration of this testimony.