

August 14, 2017

Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

***Re: In the Matter of Call Authentication Trust Anchor
Notice of Inquiry
WC Docket No. 17-97***

To Whom It May Concern:

The American Financial Services Association (AFSA)¹ appreciates the Federal Communications Commission's (FCC) efforts to better protect American consumers from unwanted and oftentimes fraudulent robocalls. AFSA supports the FCC's hard work exploring how it can further secure telephone networks against fraudulent calls by facilitating the use of methods to authenticate telephone calls and so deter illegal robocallers. AFSA agrees with the FCC that authenticating calls can help Americans to know that callers are who they say they are, which will reduce the risk of fraud.

In July, the FCC issued a Notice of Inquiry (NOI) seeking comment on implementing authentication standards for telephone calls. In particular, the FCC is seeking comment on the Alliance for Telecommunications Industry Solutions/SIP Forum proposals. These and other organizations have worked to develop protocols and a multi-phase framework designed to validate calls and mitigate spoofing and fraudulent robocalling.

Many of the specific requests for comment in the NOI are highly technical, and so as a financial services trade association as opposed to a telephone service provider, we have limited comments at this time. Mainly, we ask the FCC to ensure that the telephone number being authenticated is not necessarily the number from which the call came.

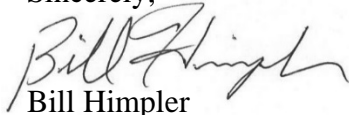
Many financial services providers have complicated telephone systems where hundreds of agents are on the telephone, talking with customers. Financial services institutions need to be able to provide customers with an effective phone number on the call ID. In other words, the number on the call ID needs to be a number that the customer can call and reach an appropriate person or department at the financial institution that is making the call. Voice service providers may either already recognize the numbers as belonging to a block of numbers belonging to the caller, or the voice service provider can obtain confirmation of the number through the caller or the caller's telephone system provider.

¹ Founded in 1916, AFSA is the national trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with many kinds of credit, including traditional installment loans, mortgages, direct and indirect vehicle financing, payment cards, and retail sales finance.

We believe the NOI already anticipates callers with multiple number and is mainly focused on the specifics for authentication. Nonetheless, we believe this is an important issue and want to emphasize its importance.

AFSA thanks the FCC for taking this important step in offering a solution to consumers plagued by fraudulent robocalls. Please contact me by phone, 202-466-8616, or email, bhimpler@afsamail.org, with any questions.

Sincerely,

A handwritten signature in black ink that reads "Bill Himpler". The signature is written in a cursive style with a large, stylized "B" and "H".

Bill Himpler

Executive Vice President

American Financial Services Association