

**Best Practices Relating to Redress Requests**  
*Adopted August 18, 2021*

**USTelecom Blocking and Labeling Working Group**

In accordance with FCC authority and guidelines,<sup>1</sup> voice service providers block and label illegal and unwanted calls, both directly and in conjunction with analytics engine (“AE”) partners. Voice service providers and AEs believe it is important to establish best practices for redress of issues relating to blocking and labeling, beyond what has already been mandated by Congress and the FCC.<sup>2</sup>

While most requests for redress are resolved within hours, participating voice service providers and AEs commit to resolving at least 95% of Qualifying Blocking and Labeling Requests (as defined below) for redress within 2 business days. Remaining requests for redress will be resolved within a reasonable time frame, based on circumstances, in accordance with the mandate established by the FCC for voice service provider redress of blocking. For requests that cannot be resolved within 2 business days, voice service providers and AEs will keep the requestor reasonably apprised of status and updates.

In addition to the expectations described above, voice service providers will provide an initial status update within 24 hours, consistent with the FCC’s Fourth Report and Order.<sup>3</sup>

Qualifying Blocking and Labeling Requests for redress are:

1. Requests submitted with information accurately provided such as phone numbers, contact name, contact e-mail, company name, originating service provider if available, and suspected label if available. If there is a form, the form must be filled out completely.
2. Requests submitted:
  - to a voice service provider’s single point of contact, as required by the FCC; or
  - to a voice service provider’s complaint/ticket resolution system, or
  - to an AE directly.

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<sup>1</sup> See *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, WC Docket No. 17-97, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9706 (2017); *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, 34 FCC Rcd 4876, 4886-88, paras. 33-34 (2019).

<sup>2</sup> The Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274, (TRACED Act) (2019) requires that blocking services be provided “with transparency and effective redress options.” TRACED Act, Section 10(b). In implementing the requirement for effective redress relating to blocking, the FCC has mandated that voice service providers provide a single point of contact and address redress requests in a reasonable amount of time, in addition to the 24-hour status update requirement described in the text of this best practices document. The best practices set forth herein apply to labeling as well as blocking.

<sup>3</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Fourth Report and Order, 35 FCC Rcd 15221, 15245-46 paras. 71-72 (2020).

The following should also be noted:

1. The ability for voice service providers and AEs to resolve any requests is dependent upon requestor responsiveness to voice service provider and AE requests for additional information.
2. Some requests for redress relating to blocking or labeling of unwanted calls (versus fraudulent calls) may require more time for resolution (the reasonable standard still applying).
3. A significant number of calls are not blocked or labeled by a voice service provider or AE but by the consumer via customer opt-in preferences and/or over-the-top (“OTT”) apps on the consumer’s device. Voice service providers and AEs have no ability to resolve these instances of blocking and labeling.
4. Other issues that may delay resolution include:
  - Establishing Telephone Number (“TN”) authorization/right to use.
  - Complicated calling use cases involving multiple service providers and/or voice service provider networks.
  - Submission by requestor of a large number of TNs, not all of which are being either blocked or labeled.
  - Large TN submissions where requestor interchangeably uses the words “blocked” and “labeled” instead of clearly identifying which TNs were blocked and which were labeled.
5. Particularly relating to blocking and labeling of “unwanted” calls, “resolution” of requests for redress does not necessarily mean calls are no longer blocked or labeled. For example:
  - If the caller is using an Invalid Number<sup>4</sup>, the caller must take action to resolve this issue.
  - If the call is being blocked at the request of the called party, calls may continue to be blocked or labeled.
  - If the provider has a good-faith reason to believe that the calls are being properly blocked or labeled.
6. Adhering to these best practices is also an important element of restoring trust in the ecosystem. As examples:
  - If feasible, trusted call originators can encourage customers to add call originator information into customer contact lists, in which case call labeling will not impact the display name.
  - Call originators should endeavor to make their calling practices consistent with number formatting standards and not utilize Unassigned,<sup>5</sup> Unallocated,<sup>6</sup> Invalid or Do Not Originate<sup>7</sup> numbers, or unlawfully spoof or illegally alter the Caller ID (*i.e.*, spoof the Caller ID with the intent to defraud, cause harm, or wrongfully obtain anything of value) when making outbound calls.

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<sup>4</sup> An “Invalid Number” is a TN that does not conform to the North American Number Plan (NANP) structure, e.g., a TN with an unassigned area code or use of an abbreviated code such as 911 or 411.

<sup>5</sup> An “Unassigned Number” is a TN that the NANPA or PA has allocated to a provider but is not currently used.

<sup>6</sup> An “Unallocated Number” is a TN that has not yet been allocated by NANPA or the Pooling Administrator (PA) to any provider.

<sup>7</sup> A “Do Not Originate Number” is a TN that the subscriber does not use to make outgoing calls and requests that calls purporting to originate from that number be blocked.

7. It is the intent of all parties involved with these Best Practices that this discussion be ongoing, and that a review of memorialized practices herein be conducted every 6 months.