

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123
)	
Misuse of Internet Protocol (IP) Relay Service and Video Relay Service)	
)	

**Comments of the
Alliance for Telecommunications Industry Solutions**

Pursuant to Section 1.415 of the Federal Communications Commission’s (FCC) rules, the Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Telecommunications Fraud Prevention Committee (TFPC), hereby files these comments in response to *Further Notice of Proposed Rulemaking* released May 8, 2006, in the above-referenced docket.¹ ATIS commends the FCC for investigating the issue of fraud involving telecommunications relay services (TRS) and notes that the ATIS TFPC is available to assist in the development of the underlying technical standards and guidelines that may be necessary to implement any new TRS fraud rules.

¹ Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities , CG Docket No. 03-123, *Further Notice of Proposed Rulemaking*, 71 Fed Reg. 31131 (2006).

Background.

ATIS is a technical planning and standards development organization committed to rapidly developing and promoting technical and operational standards for communications and related information technologies worldwide using a pragmatic, flexible, and open approach. Industry professionals from more than 350 communications companies actively participate in ATIS' open industry committees, forums, and "Incubators."² The ATIS membership spans all segments of the communications industry, including local exchange carriers, interexchange carriers, manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, broadband providers, providers of operations support, software developers, and internet service providers.

The ATIS TFPC is a part of the Performance, Reliability, and Security Functional Group of ATIS. The TFPC is dedicated to resolving fraud issues impacting the telecommunications industry. It identifies issues common to the industry involving telecommunications fraud, and provides an inter-industry mechanism to discuss and develop resolutions for these issues that meet industry needs and requirements. The TFPC focuses on issues such as: VoIP Fraud Implications; Automatic Number Identification (ANI) Masking; Application Screening for Subscription Fraud and/or Identity Theft; Local Number Portability (LNP) Impacts on Churn, Settlements, and Abuses; Joint Billing Management; Payment Fraud Management; Voice Mailbox Hacking; and Call Forwarding Fraud. Due to the sensitive nature of the work performed in the TFPC, companies wishing to participate in the TFPC must first execute a non-disclosure agreement. Any company that is eligible for ATIS membership and has an interest in

²ATIS Incubators are industry-driven work groups that provide the industry with a "fast-track" process for resolving technical and operational issues. For more information, see the ATIS incubator web site at: <http://www.atis.org/incubator.shtml>.

telecommunications fraud may join the TFPC.³ The agreement permits a full and open discussion among members of issues pertaining to telecommunications fraud, while limiting access to documents by those that might seek to perpetrate fraud.

Comments.

In the *FNPRM*, the FCC seeks comment on a number of proposals that may address the misuse of two forms of TRS— Internet Protocol (IP) Relay Service and Video Relay Service (VRS). The *FNPRM* is aimed at addressing reports of the misuse of IP Relay Service and VRS to make fraudulent purchases using stolen credit cards, to make harassing calls or to improperly avoid paying for in-person interpreting services. Among the issues raised by the FCC is whether changes are necessary to its rules to permit IP Relay Service or VRS providers and their communications assistants to screen out and, where appropriate, terminate calls they determine are not legitimate.

ATIS commends the FCC for investigating the issue of TRS fraud. The ATIS TFPC has been at the forefront of identifying and addressing telecommunications fraud since its inception in 1988, and recognizes that there will always be individuals that are willing to take advantage of technical and regulatory innovations. ATIS recognizes that changes to the regulatory environment alone will not be sufficient to address TRS fraud. The telecommunications industry will need to develop standards and guidelines to support the

³ Currently, the following companies participate in the TFPC: AT&T, Bell Canada, BellSouth Long Distance, BSG Clearing Solutions, British Telecom, Cisco Systems, Inc., Consolidated Communications, Cox Communications, Neural Technologies Limited, Neustar, Pay Tel/APCC, Qwest, Sprint Nextel, TCC Teleplex, Tekelec and Verizon.

implementation of the new rules. ATIS believes that its TFPC is uniquely suited to develop these technical standards and guidelines.

First, the TFPC has significant fraud management expertise, including extensive experience in the development of technical countermeasures to combat fraud. Participants in the TFPC include some of the largest communications companies in the world, as well as smaller competitive local exchange carriers and key equipment providers. The FCC has itself previously relied on TFPC's expertise in examining telecommunications fraud relating to TRS. In 1993, the FCC asked the TFPC to examine the potential for toll fraud surrounding the inception of TRS.⁴ The fraud management professionals in the TFPC may also draw on the significant technical expertise available from other ATIS committees in the development of implementation standards.

The ATIS TFPC is well-structured to examine telecommunications fraud issues and to craft effective solutions. The mandatory non disclosure agreement executed by all participating companies permits the disclosure and exchange of sensitive and proprietary information regarding telecommunications fraud prevention. This type of information is necessary to the development of effective solutions, but cannot, and should not, be disclosed in a public forum.

⁴ TFPC Issue #30, Submitted August 17, 1993, and Final Closure April 25, 1995.

THEREFORE, THE PREMISES CONSIDERED, ATIS respectfully submits its comments in response to the *FNPRM* in the above-referenced docket.

Respectfully submitted by:

**The Alliance for
Telecommunications Industry
Solutions** on behalf of its
Telecommunications Fraud
Prevention Committee



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