

INDUSTRY
TRACEBACK
GROUP

COMBATTING
ILLEGAL
ROBOCALLS

INDUSTRY
TRACEBACK◀◀◀
GROUP

- 
- › **In 2020, Americans fell for scam callers 270% more often than in 2019¹**
 - › **90% of scam calls from abroad now show up as U.S. numbers²**
 - › **89% of seniors receive at least one robocall per week, while more than half (56%) receive at least seven robocalls per week³**

INTRODUCTION + SUMMARY

Since USTelecom – The Broadband Association established the Industry Traceback Group (ITG) in 2015, the ITG has played a central and ever-growing role in the battle against illegal robocalls.⁴ Each day the ITG traces back dozens of illegal robocall campaigns to their source and seeks to stop them there. The campaigns targeted by the ITG range from burgeoning robocall scams seeking to prey on fears related to the COVID-19 pandemic to government and brand impersonations to telephony denial of service (TDoS) attacks on hospitals and public safety phone lines. ITG tracebacks rely on the cooperation and collaboration of hundreds of domestic and foreign voice service providers, including the over forty ITG members that support the effort. The ITG also works in close partnership with government entities who rely on ITG referrals and data to bring those individuals and entities responsible for illegal robocalls to justice. The ITG was designated by the Federal Communications Commission (FCC) in July 2020 to fulfill the role of the official Congressionally-mandated traceback consortium.⁵

ITG OVERVIEW

The FCC estimates that the “wasted time and nuisance” caused by scam robocalls

EXCEEDS

**\$3
BILLION**

EACH YEAR

While fraudulent robocall schemes cost Americans about

**\$10
BILLION**

ANNUALLY⁶

SINCE 2015, the ITG, a collaborative effort of voice service providers from across the wireline, wireless, VoIP, and cable industries, has been actively tracing and identifying the source of illegal robocalls. The ITG provides a neutral coordination platform for voice service providers to trace and identify the source of illegal robocalls and protect consumers from fraudulent, abusive, and/or unlawful robocalls.

IN 2020

Over **350 providers** participated in ITG tracebacks of suspected illegal robocalls

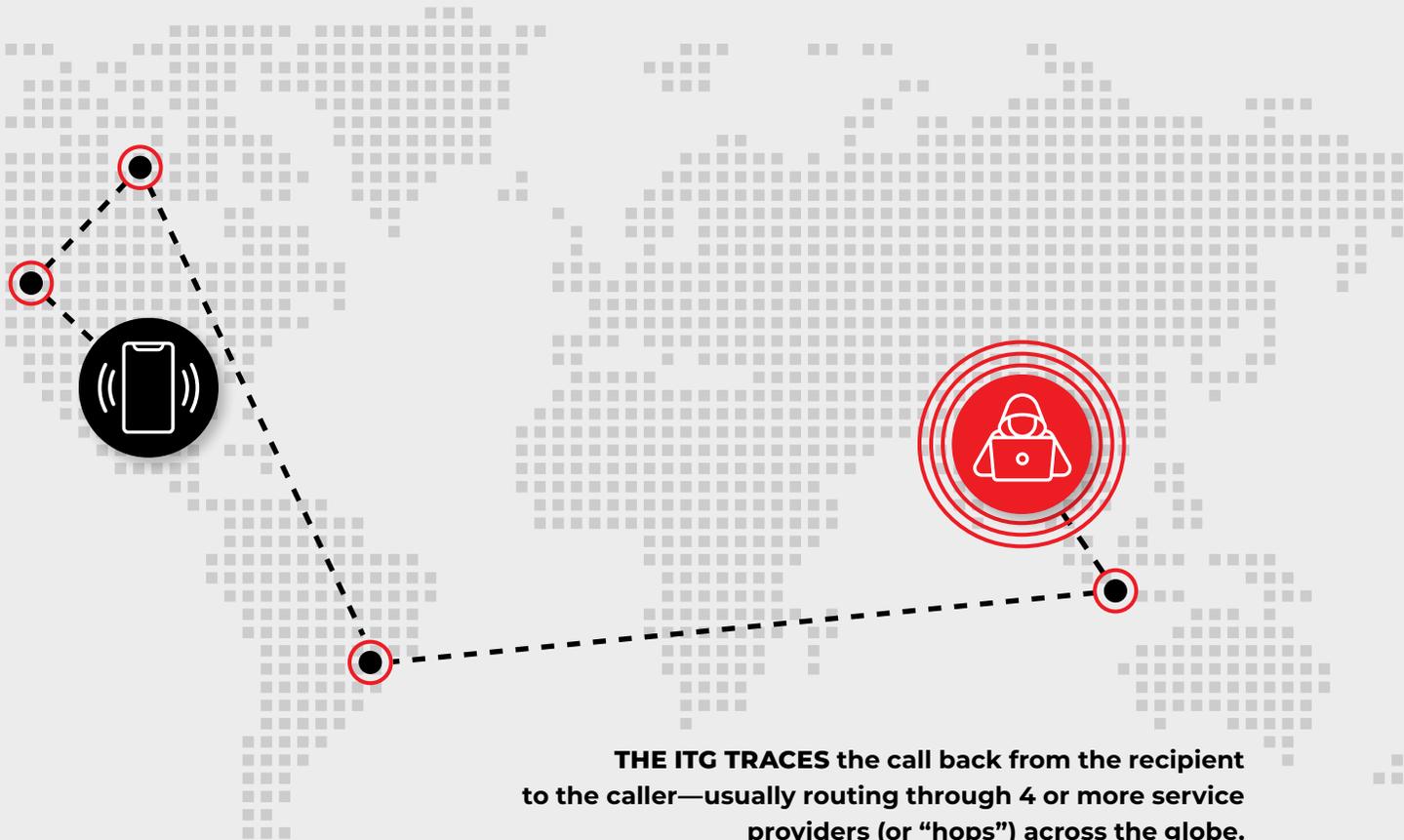
ITG membership increased to **over 40** voice service provider supporters

The origination, delivery, and termination of robocalls involves numerous voice service providers in a complex ecosystem. Using a secure traceback portal, suspected illegal robocalls are traced systematically back through various networks until the ITG identifies the originator of the suspicious calls, where the calls entered the United States if internationally originated, and often the identity of the calling party.

Since providers only know who they received a call from and where they routed it, the ITG traces the call back from the recipient to the caller—usually routing through 4 or more, or sometimes as many as 9 or 10 service providers (or “hops”) across the globe.

With billions of calls traversing the networks of hundreds of interconnected companies, providers historically had limited insight into exactly what role they played, and to what extent, in the illegal robocalling problem—and in turn, what actions they could take to address it. The ITG’s centralized traceback process itself has changed that. Upon receipt of a traceback notice, a provider now has information it can act on: the provider learns

TRACING BACK A CALL >>> *from caller to recipient*



THE ITG TRACES the call back from the recipient to the caller—usually routing through 4 or more service providers (or “hops”) across the globe.

In 2020, average time to complete a traceback fell by over

50%
to approximately
4 DAYS



Average time to complete an individual hop is now

**LESS THAN
1 DAY**

Many providers regularly respond in less than

30
MINUTES

about the illegal robocalls flowing through its network and can engage with the provider or customer providing that problematic traffic. In turn, providers have built processes and practices based on this new information. Thought-leading voice service providers modified contracts to incorporate traceback amendments, engaged with upstream voice service providers to identify and halt illegal traffic, and refined their customer and partner vetting process. Some implemented new technology that monitors calling traffic for suspicious patterns in real time and/or via automated post-call analysis.

The ITG's primary focus is high-volume illegal robocall campaigns, but it also successfully conducts tracebacks on lower volume, but equally or even more harmful campaigns, such as telephony denial of service (TDoS) attacks, social engineering attempts, and safety-of-life threats to individuals.

The ITG's operations are managed by a small team of employees and contractors who work daily with numerous industry and government partners to identify sources of illegal robocalling campaigns. The team initiates and monitors the tracebacks, on-boards new providers that have not previously participated in tracebacks, and addresses specific questions or requests from individual providers, in addition to providing regular reports to ITG members and hosting virtual meetings for the industry to discuss best practices, trends, and regulatory activity. The ITG team routinely collects and analyzes data about evolving illegal robocall patterns and their sources and collaborates with government agencies that rely on this information to bring enforcement against the perpetrators. The team also makes the data available to ITG members to help them make informed decisions about the traffic they carry over their networks.

IN 2020 THE ITG:

1

Received **75 subpoenas/ civil investigative demands—up 275%** from 2019

2

Conducted approximately **215 tracebacks per month—up 115% from 2019 and 975% in 2018⁷**

3

Initiated more than **2,500 tracebacks, representing hundreds of millions of calls.**

4

Supported nearly **one dozen enforcement actions** involving **nine distinct federal and state enforcement agencies, targeting nearly 50 individuals and entities**

COLLABORATION + RECOGNITION

A key ingredient to the ITG's effectiveness is its partnership with enforcement agencies at the federal and state level. Federal and state enforcement agencies are increasingly realizing the ITG's tremendous value in pursuing successful enforcement actions.

- ▶ Then-FCC Chairman Ajit Pai cited the “collaborative and ongoing effort between our own Enforcement Bureau staff and experts from the USTelecom Industry Traceback Group.”⁸ He further emphasized how “collaboration across government and with industry can bring robocallers to justice.”⁹
- ▶ Then-Federal Trade Commission (FTC) Chairman Joseph Simons said that the ITG “is very effective and we are overjoyed with their progress.”¹⁰
- ▶ In a letter to USTelecom CEO Jonathan Spalter, the National Association of Attorneys General and 52 state Attorneys General wrote, “[M]ultiple state attorneys general have issued subpoenas or civil investigative demands to the ITG and received valuable information for their investigations. In short, the partnership between the ITG and the state attorneys general is a crucial one, and we endeavor to strengthen it.”¹¹
- ▶ FCC Enforcement Bureau Chief Rosemary Harold called the ITG “a vital partner in [the FCC’s] pursuit of unlawful robocallers” in announcing the ITG’s selection as the official U.S. traceback consortium.¹²
- ▶ And in a late 2020 report to Congress, the FCC reported that ITG tracebacks have “accelerated the investigation process,” allowing “a traceback that would have taken at least four separate subpoenas and 2 to 3 months to complete ... successfully traced back in less than 24 hours.”¹³

The ITG continues to increase the scale and scope of tracebacks it performs, increasing the total volume of tracebacks and actively working to focus on truly fraudulent calls.

The ITG’s operations are managed by a small team of employees and contractors who work daily with numerous industry and government partners to identify sources of illegal robocalling campaigns.

2015-2018

During this period the group expanded and our traceback process matured, including the launch of a secure traceback portal adding efficiency and analytical capabilities to the process.

AUGUST 2019

51 State Attorneys General and 12 national voice service providers announce traceback commitment.

DECEMBER 2019

Congress enacts the TRACED Act, formalizing industry traceback efforts through designation of an official traceback consortium.¹⁴

JANUARY 2020

Relying on ITG data, DOJ takes first-of-its-kind enforcement action against U.S.-based domestic VoIP providers and their principals.

APRIL 2020

ITG plays instrumental role in working with both the FCC and FTC to shut down a series of illegal robocalls exploiting the COVID-19 global pandemic.

JUNE 2020

ITG tracebacks support \$225M proposed forfeiture, the FCC's largest ever, regarding approximately 1B illegally spoofed robocalls.

JULY 2020

FCC's Enforcement Bureau designates the Industry Traceback Group as the Official Traceback Consortium for coordinating industry-led efforts to trace back the origin of suspected unlawful robocalls.

AUGUST 2020

Michigan Attorney General becomes first state authority to permanently shut down a VoIP service provider and bar its ownership from working in the industry.

SEPTEMBER 2020

FCC adopts mandatory traceback cooperation requirement as part of any mandated robocall mitigation program.¹⁵

THE EVOLUTION OF THE ITG

LOOKING FORWARD

In its sixth year—and first full year since being designated as the official U.S. registered traceback consortium—the ITG intends to build on its foundation and success to date. The ITG is looking to expand its partnerships with enterprises and other organizations that are victims of brand impersonation and other illegal robocall activity, as well as enhance the ways it supports voice service providers and government entities in their efforts to hold illegal robocallers and those that enable them accountable.

DECEMBER 2020

FCC extends mandatory traceback requirement, making clear that all “voice service providers are now legally required to respond to traceback requests from the [ITG].”¹⁷

OCTOBER 2020

The ITG with its industry partners successfully work with a hospital to stop separate TDoS attacks targeting a hospital, possibly for cyber extortion.¹⁶

ITG begins tracing back high-volume “Stay Safe, Stay Home” robocall campaign, telling millions of Americans to stay home.

SEPTEMBER-OCTOBER 2020

ITG traces back robocalls intended to suppress mail-in votes in the Presidential election, which ultimately led to felony charges against two individuals.

ENDNOTES

- 1 First Orion, <https://www.techrepublic.com/article/phone-scammers-were-able-to-get-270-more-personal-information-in-2020-than-in-2019/>
- 2 How robocalls became America's most prevalent crime, The Week, December 7, 2019; available at: <https://theweek.com/articles/882482/how-robocalls-became-americas-most-prevalent-crime>
- 4 TNS Report: COVID-19 Leads to First Robocall Volume Drop In Years, September 15, 2020; available at: <https://www.businesswire.com/news/home/20200915005194/en/TNS-Report-COVID-19-Leads-to-First-Robocall-Volume-Drop-In-Years>
- 5 The Industry Traceback Group is a wholly-owned subsidiary of USTelecom – The Broadband Association.
- 6 Bree Fowler, Coronavirus Robocall Scams Spotlight Need for Better Consumer Protections, Consumer Reports, 4/3/2020
- 7 See USTelecom Industry Traceback Group, 2019 Progress Report, at 5, https://www.ustelecom.org/wp-content/uploads/2020/01/USTelecom_ITG_2019_Progress_Report.pdf.
- 8 Statement of Chairman Ajit Pai, p. 1, *In the Matter of John C. Spiller; Jakob A. Mears; Rising Eagle Capital Group LLC; JSquared Telecom LLC*, Notice of Apparent Liability for Forfeiture, FCC 20-74 (rel. Jun. 10, 2020)
- 9 *Id.*
- 10 Senate Committee on Commerce, Science and Transportation Committee Hearing, Oversight of the Federal Trade Commission at 2:18:38, August 5, 2021, <https://www.commerce.senate.gov/2020/8/oversight-of-the-federal-trade-commission>.
- 11 Letter from 52 State Attorneys General to Jonathan Spalter, President & CEO, USTelecom – The Broadband Association, May 4, 2020, <https://www.ustelecom.org/wp-content/uploads/2020/05/Final-NAAG-Letter-USTelecom.pdf>.
- 12 FCC Press Release, FCC, *FCC Designates Robocall Traceback Manager*, July 27, 2020, <https://docs.fcc.gov/public/attachments/DOC-365751A1.pdf>.
- 13 FCC Enforcement Bureau, Consumer and Governmental Affairs Bureau, and Wireline Competition Bureau, *Report to Congress on Misleading or Inaccurate Caller Identification Information*, at 16 Dec. 23, 2020, <https://docs.fcc.gov/public/attachments/DOC-368957A1.pdf>.
- 14 TRACED Act, Section 13(d).
- 15 See DOJ Press Release, The Department of Justice Files Actions to Stop Telecom Carriers Who Facilitated Hundreds of Millions of Fraudulent Robocalls to American Consumers, Jan. 28, 2020, <https://www.justice.gov/opa/pr/department-justice-files-actions-stop-telecom-carriers-who-facilitated-hundreds-millions>.
- 16 See *Hospital Robocall Protection Group (HRPG) Report*, Dec. 15, 2020, at 10, https://www.fcc.gov/sites/default/files/hrpg_report.pdf.
- 17 *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*, Fourth Report and Order, FCC 20-187, ¶ 19 (rel. Dec. 30, 2020).

ITG SUPPORTING PARTNERS

PLATINUM PARTNERS

AT&T



COMCAST



T-MOBILE



VERIZON



GOLD PARTNERS

BELL CANADA



CHARTER COMMUNICATIONS



COX COMMUNICATIONS



LUMEN



SILVER PARTNERS

CONSOLIDATED COMMUNICATIONS



FRONTIER



TWILIO



U.S. CELLULAR



SILVER PARTNERS (cont.)

WINDSTREAM



COPPER PARTNERS

BANDWIDTH



INTELIQUENT



WEST TELECOM SERVICES, LLC/INTRADO



BRONZE PARTNERS

ALL ACCESS



ALLIANCE GROUP SERVICES



ANI NETWORKS



BRIGHTLINK



BROADBAND DYNAMICS



BUSINESS TELECOMMUNICATIONS SERVICES



FULL SERVICE NETWORK



G4



BRONZE PARTNERS (cont.)

IMPACT TELECOM



INTELEPEER



LANDING POINT TELECOM



Landing Point Telecom

O1 COMMUNICATIONS



PEERLESS NETWORK



PIRATEL



TALKIE FIBER



TELNET



TELNYX, LLC



THINQ



THIRD BASE INTERNATIONAL TELECOM



VOXOLOGY

VOXOLOGY

XCAST LABS



YMAX



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- › **Supported enforcement actions against nearly 50 individuals and entities**