

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

In the Matter of)

Rules and Policies Regarding Calling Number)
Identification Service – Caller ID)

CC Docket No. 91-281

**COMMENTS ON THE NOTICE OF PROPOSED RULEMAKING REGARDING
CALLING NUMBER IDENTIFICATION SERVICE – CALLER ID
(FCC 17-76)**

E-Rate Central submits these Comments in response to the FCC’s Notice of Proposed Rulemaking released June 22, 2017 (designated FCC 17-76) seeking comment on the FCC’s proposal to amend its Caller ID rules to enable called parties and/or law enforcement agencies to obtain blocked Caller ID information in connection with threatening calls.

E-Rate Central is an independent firm providing E-rate application and consulting services to schools and libraries nationwide. It also provides E-rate support services for several states and is an active member of the State E-Rate Coordinators’ Alliance (“SECA”) and the E-Rate Management Professionals Association (“E-MPA”).

In March last year, we wrote in support of Middletown School District’s request for a limited waiver of the Commission’s Calling Party Number (“CPN”) rules. In addition to supporting Middletown’s petition, [E-Rate Central’s comments](#) encouraged the Commission to amend its CPN rules to include a specific CPN exemption, subject to the same protections, for any school receiving threatening phone calls. We continue to support that position and applaud the Commission on its proposal to expand the CPN exemption for all threatened parties.

The proposed rule amendments strike a reasonable balance between the privacy of the calling individuals for whom the original CPN rules were designed, and the called individuals or organizations subject to highly disruptive and/or dangerous threats.

One important benefit of the Commission’s proposal to permanently amend its CPN rules is to eliminate the time-consuming and burdensome process of seeking limited waivers to the rules on a

case-by-case basis as has been done in the past. Threatening situations, when they arise, are typically of a transient nature and need to be addressed immediately.

Over the past few years, as shown in the following table, the Commission has dramatically shortened the waiver response time. Most recently, the Commission granted a limited waiver in only three days upon the request of Senator Charles Schumer. Taking into account the time it probably took to obtain the Senator’s involvement, the waiver likely came a week or more after the incident(s). A late waiver may ultimately lead to the perpetuator of the threatening calls, but only after the immediate threat has abated — or, worse yet, has been carried out.

Waiver Applicant	Order	Date of Request	Waiver	Elapsed Days
Liberty Public School District	DA 13-1032	04/22/07	05/09/13	2,209
Chevrah Hatzalah Volunteer Ambulance Corps	DA 13-227	09/30/11	02/20/13	509
Enlarged City School District of Middletown	DA 16-400	02/18/16	04/13/16	55
Jewish Community Centers	DA 17-223	02/28/17	03/03/17	3

Besides the timing advantage, a key benefit of a permanent amendment of the CPN rules, as proposed, is that it permits law enforcement agencies to know with certainty — and train for — their investigative rights and responsibilities when their constituents are threatened.

E-Rate Central encourages the Commission to adopt the proposed amendments to its Caller ID rules 47 C.F.R. § 64.1601(b).

Respectfully Submitted by:



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