

**United States Senate**  
**Committee on Commerce, Science and Transportation**  
**“Stopping Fraudulent Robocall Scams: Can More Be Done?”**  
**Statement of Matthew Stein**  
**Chief Technology Officer, Primus Telecommunications Inc.**

**July 10, 2013**

Thank you Chair and distinguished members of the Committee. My name is Matthew Stein, and I am the Chief Technology Officer of Primus Telecommunications Inc. While my responsibilities at Primus cover all of our technology assets globally, my comments today are specific to our Canadian business, known as Primus Canada. As in the United States, robocalls are a similar concern in Canada and I thank you for the opportunity to speak to a technological solution invented, developed, and deployed by Primus to assist our customers with this issue.

Primus provides a service called Telemarketing Guard to all of our telephone customers in Canada. This patented service was invented in 2006, and deployed in 2007 in direct response to our customers’ discontent with their inability to control and limit unsolicited calls. The concerns expressed by our customers are familiar – unwanted calls interrupting dinner, interrupting quiet evenings, interrupting family time and, in many cases, the inability to make the calls stop no matter how many times the customer asks to be taken off one kind of list or put on another.

Before I proceed, it is important to make clear that we view robocalls and automated telemarketing calls as a subset of mass unsolicited calling, which for convenience I will generally refer to as telemarketing calls throughout my presentation. Our customers have made clear that their view of telemarketing calls does not change if they are greeted by a live person or a recorded message when they pick up the phone.

Telemarketing Guard addresses this issue by providing customers with control over how they wish to deal with telemarketing calls. When a call is placed to a customer protected by Telemarketing Guard, our system evaluates the call even before the customer’s phone is rung. If the system believes, based on feedback provided by our customers, that the caller is likely a

telemarketer, the call does not go directly to our customer. Instead, a message is played advising the caller that the customer does not accept telemarketing calls and invites them to press 1 to record their name, so that their call can be announced to the party they are calling. After the caller records their name, similar to leaving a voicemail, the system calls our customer and advises them that they have received a potential telemarketing call and plays the recording provided by the caller. The customer then has the choice to accept the call, refuse the call, or send the call to voicemail if available. In fact, customers often decide to ignore the call altogether without even having to answer the phone as the caller ID will display the name “Telemarketing Guard” along with the original caller’s phone number.

Telemarketing Guard uses the actions of our customers to identify potential telemarketing calls. The system is completely neutral to all calling telephone numbers until a report from a customer is received. As a result, all calls – telemarketing and non - will initially proceed completely unimpeded to our customers. If a customer receives an unscreened telemarketing call, it is up to them to decide whether or not to report the number, which they can do through their phone. If they choose to report the call and if a threshold of customers reporting the same number is reached, the system then begins to monitor the calling phone number and applies a number of behavioural characteristics (e.g. frequency of calling, time of day concentration, sequential calling, etc.) to determine whether the call should be identified as a telemarketing call on a going forward basis.

In essence, the system promotes and relies on customer engagement to identify potential telemarketing calls. The reverse is also true. If enough customers accept a call from an identified telemarketer, the number will cease to be considered a telemarketer by the system. Several other safeguards are employed by the system to ensure that calling numbers are not erroneously identified.

Customer engagement and response has been exceptional. Based on our internal surveys, the service has increased customer satisfaction and become one of the leading reasons that customers choose to keep their phone service with Primus. In fact, few customers have selected to disable the service.

In regards to costs and implementation, the system is not overly complicated or expensive to establish and maintain. For its part, Primus currently provides Telemarketing Guard to all of its telephone customers at no extra charge. The system can also be easily grafted into an existing network and deployed, such as we did. It can work for traditional land line phones, voice-over-IP phones, or mobile phones, if the Service Provider so configures it. The service does not require customers to purchase or install any equipment or software whatsoever, nor does it require customers to actively participate in reporting in order to benefit from the reports of other customers. Additionally, the service itself can be adapted and configured to address specific needs of customers, telephone service providers or legislative and regulatory bodies.

In addition to being a powerful consumer tool, we believe that Telemarketing Guard is consistent with the competitive interest of telecommunications carriers to provide valuable services to customers. Primus therefore welcomes the effort of the Subcommittee to identify for consumers a way that they can be equipped with the means to address unsolicited calls and to encourage carriers to offer services that provide such tools to customers.

Thank you and I look forward to any questions that you may have.