
**ATIS/SIP Forum IP-NNI Task Force
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Contribution

TITLE: Privacy and Analytics
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Abstract

This informational contribution provides clarifications on the treatment of analytics information and adherence to privacy rules.

NOTICE

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Privacy and Analytics

A clarification

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Agenda

- Privacy rules
 - Background and references
 - Recent documentation on display of analytics results
- Example
 - Analytics messages vs. identifying data
- Next steps
 - Obtain and add clarifications to pertinent documents

Background

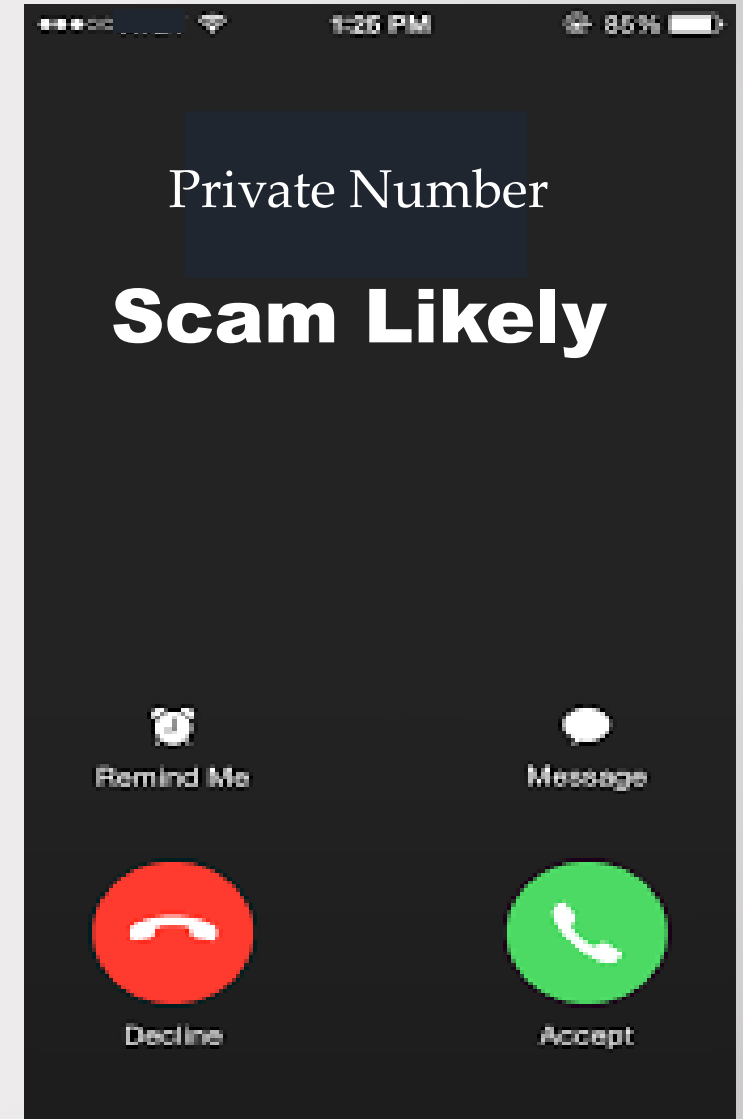
- **FCC Docket 91-281**
 - Initial ruling (March 1994) emphasized the importance of Calling Party Number (CPN) availability
 - Order allowed “per line blocking” and mandated that CPN can be “unblocked” (using *82)
 - In 1995, the order addressed other “identity” related services such as CNAM. The FCC ruled that name should be treated the same as number.
- It is important to understand that the CPN is transported through networks with instructions on whether it should be provided to the called party.
 - If blocked, then terminating network and services must prevent the called party from seeing, hearing or using the calling party information.
 - 47 CFR §64.1601(b) states: “Carriers must arrange their CPN-based services, and billing practices, in such a manner that when a caller requests that the CPN not be passed, a carrier may not reveal that caller's number or name, nor may the carrier use the number or name to allow the called party to contact the calling party.”

Analytics Function is new

- ATIS-1000081 provided the following guidance
 - ..the analytics provider is expected to adhere to the application of privacy rules for the calling number and name portions of the display; i.e., an "Anonymous" message would be displayed for name and TN.
 - Further clarification and/or safe harbors are needed to determine whether the name and TN could be anonymized while additional call information, such as call category and potential fraud risk could be delivered to help empower the end user.
 - The determination of the authentication of the call is NOT "call information" in the traditional sense and should be presented to the user independent of legitimate privacy uses.

Example

- Scam campaign launches calls with a blocked telephone number (TN).
 - Remember the CPN is still transported with blocking instructions
 - Analytics determine the TN is associated with reported scams
 - CPN, Name or identifying metadata (in eCNAM) are **NOT** displayed
 - Analytics assessment such as “scam likely” should be communicated to the end user without any identifying data
 - Helps protect the consumer without violating the FCC call blocking rules



Goal

- Obtain clarification from the FCC.
- Add clarifications in ATIS-1000081 and relevant caller identity documents on the distinct treatment of “identifying” vs “non-identifying” call data.
- Guidance to analytics providers on their responsibilities in handling anonymous caller information.
 - *Note: all of the above is subject to local policy where the service provider may override the distinctions and potentially block ALL information.*



Thank you