

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implications of Artificial Intelligence)	CG Docket No. 23-362
Technologies on Protecting Consumers from)	
Unwanted Robocalls and Robotexts)	

REPLY COMMENTS OF CTIA

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CTIA respectfully submits these reply comments in response to the Federal Communications Commission’s (“Commission” or “FCC”) Notice of Proposed Rulemaking (“*NPRM*”) and Notice of Inquiry (“*NOI*”)¹ proposing to define “[Artificial Intelligence (“AI”)]-generated calls” and subject those calls to specific pre- and on-call disclosure and consent requirements under the Telephone Consumer Protection Act (“TCPA”) and seeking additional information about developing technologies that can alert consumers to unwanted or illegal calls.

I. INTRODUCTION AND SUMMARY.

Consistent with CTIA’s initial comments in this proceeding, the record demonstrates a broad consensus that AI technologies offer innovative solutions to facilitate legitimate communications and protect consumers from bad actors who would use AI for illegal robocalls and robotexts. Commenters highlight the variety of ways that communications providers, solutions providers, and callers are already responsibly leveraging AI to bring innovative capabilities—and new protections—to consumers. The record also demonstrates that industry stakeholders, consumer advocates, and policymakers are continuing to work collaboratively to develop foundational practices and policies for safe and responsible use of AI technologies.

¹ *Implications of Artificial Intelligence Technologies on Protecting Consumers from Unwanted Robocalls and Robotexts*, Notice of Proposed Rulemaking and Notice of Inquiry, FCC 24-84 (rel. Aug. 8, 2024) (“*NPRM*” and “*NOI*”).

The record confirms that the Commission has the tools needed to accomplish the goals of the *NPRM* without the adoption of proposals that would cause confusion for callers, providers, and consumers and undercut innovative solutions. The record shows that AI is being developed with consumer protection in mind, and that, if needed, the *TCPA Declaratory Ruling* adopted earlier this year provides authority for the Commission to bolster those protections and go after bad actors. As a result, commenters agree that the Commission should not (i) adopt a specific definition of “AI-generated” call or (ii) impose pre- and on-call disclosure and consent requirements to use AI. These proposals risk confusing consumers, callers, and providers alike and chilling the use of innovative solutions.

Instead, the Commission should continue to engage with industry, advocate, and government partners to promote positive uses of AI while encouraging new technologies and techniques that can identify and prevent illegal robocalls. For example, evolving Rich Call Data (“RCD”) and branded calling solutions can enhance consumers’ control over the calls they want to answer and avoid unwanted calls, and natural language processing solutions that utilize AI can identify and stop illegal robocalls before they reach consumers.

There also is broad record support for ensuring that people with disabilities can leverage AI tools and solutions to access communications services without facing unnecessary risk of enforcement from the Commission or litigation under the TCPA. Commenters provide varied suggestions for the Commission’s further consideration to accomplish this goal without opening significant loopholes for bad actors to exploit.

Finally, the record demonstrates that the Commission should be cautious about promoting solutions that would detect and identify AI-generated calls in real-time. As the Commission recognizes and the record supports, these solutions raise significant privacy considerations.

Further technical and policy evaluations are needed before the Commission encourages wide adoption of such solutions. Instead, the Commission can continue to rely on the efforts providers are already making to protect consumers from unwanted and illegal robocalls and robotexts.

II. THE RECORD DEMONSTRATES THAT AI CAN FACILITATE LEGITIMATE COMMUNICATIONS WHILE PROTECTING CONSUMERS FROM NEW THREATS.

The record provides numerous examples of ways that callers and providers are already leveraging AI to improve consumer experiences and protect consumers from problematic exploitation of AI by bad actors. Commenters highlight that AI can increase efficiencies for consumers. For example, wireless providers offer autonomous assistants when human agents are not available.² Providers like Twilio offer real-time translation services leveraging AI.³ And AI healthcare agents are being developed to allow consumers to interact with prescription refill reminders and more easily schedule follow-up care.⁴

Likewise, commenters provide examples of how AI can make communications more accessible to people with disabilities. For example, Apple describes features such as “Personal Voice,” which allows “users at risk of losing their ability to speak . . . a simple and secure way to create a voice that sounds like them,” and “Live Speech,” which “allows users to type what they want to say and have it spoken out loud.”⁵ Microsoft explains that “AI technologies are already

² See ACA International et al. Comments at 8–9 (“ACA et al. Comments”) (discussing Klarna, an AI customer service tool); CTIA Comments at 5 (discussing AT&T’s “autonomous assistants” and Verizon’s similar efforts). Unless otherwise noted, comments were filed in CG Docket No. 23-362 on or about October 10, 2024.

³ See, e.g., Connor Jewiss, *How To Do Real-Time Call Translation On Your Phone*, TECH ADVISOR (Apr. 23, 2024), <https://www.techadvisor.com/article/2311299/how-to-do-real-time-call-translation-on-your-phone.html>; Jeff Eiden, *Live Translation with Twilio and OpenAI’s Realtime API*, TWILIO BLOG (Oct. 1, 2024), <https://www.twilio.com/en-us/blog/live-translation-contact-center-openai-realtime-api>.

⁴ See, e.g., USTelecom – The Broadband Association Comments at 3–4 (“USTelecom Comments”).

⁵ Apple Inc. Comments at 1–2 (“Apple Comments”).

being used to assist individuals with disabilities in interacting with digital content and telecommunications services,” citing efforts by Latvian language company Tilde.⁶

AI can also improve the functionality of communications networks. CTIA has previously explained how wireless providers are using AI to “analyze vast quantities of network data, identify patterns, and predict outcomes to avoid network outages.”⁷ And T-Mobile recently announced its “collaboration with NVIDIA, Ericsson, and Nokia to invest in AI-radio access networks . . . which will dramatically improve customers’ real-world network experiences and ever-growing demand for increased speeds, reduced latency, and increased reliability.”⁸

Commenters also show that industry is employing an array of tools to prevent bad actors from reaching consumers with illegal AI-generated robocalls and robotexts. For example, Transaction Network Services (“TNS”) and Twilio highlight efforts to verify caller and sender identity through know-your-customer (“KYC”) and know-your-traffic solutions. TNS offers “Enterprise Authentication, Spoof Protection, and Enterprise Branded Calling . . . services to major brands in the U.S.,” which “enhance trust in the network and business ecosystem, reducing the chances for scam artists to pose as trusted brands and exploit unsuspecting consumers.”⁹ Twilio explains its ongoing support for “industry efforts to implement caller name display solutions, such as RCD and branded calling, which can help strengthen trust in the calling network by providing consumers with just-in-time information to evaluate whether to answer a

⁶ Microsoft Corporation Comments at 3 & n.6 (“Microsoft Comments”) (citing *Empowering People with Disabilities: Tilde’s Innovative Language Technology Solutions*, MICROSOFT: CEE MULTI-COUNTRY NEWS CENTER (Apr. 27, 2023), <https://news.microsoft.com/en-cee/2023/04/27/empowering-people-with-disabilities-tildes-innovative-language-technology-solutions/>).

⁷ CTIA Comments at 4.

⁸ *Id.* at 5 (internal quotations omitted).

⁹ Transaction Network Services, Inc. Comments at 2 (“TNS Comments”).

call” and confirms that “all U.S. originating messaging traffic on Twilio’s network is registered and verified.”¹⁰

Additionally, Verizon recently highlighted a promising initiative to use natural language processing to identify illegal robocalls—including AI-generated calls—that reach their “honeypots” and prevent similar calls from further harming consumers.¹¹ Verizon transcribes unsolicited calls made to unassigned numbers and then analyzes the transcripts using natural language processing,¹² which enables it to “label incoming calls automatically and flag [the numbers] as candidates for traceback through [USTelecom’s] Industry Traceback Group” (“ITG”).¹³ Through this process, Verizon has already “identified thousands of calls belonging to over 400 robocalling campaigns.”¹⁴

As these and other AI-driven applications and services are developing to deliver both consumer benefits and protections, the record demonstrates that it is not necessary for the Commission to adopt the proposed rules at this time, and instead the Commission should support and monitor this early stage of AI technological innovation.

¹⁰ Twilio Inc. Comments at 4–5 (“Twilio Comments”).

¹¹ See generally Kate Kutchko, Verizon Business Group, *Using Natural Language Processing to Label Robocalls* (May 7, 2024), <https://www.sipforum.org/download/6-using-natural-language-processing-to-label-robocalls/?wpdmdl=5129&refresh=664d25c498f7d1716331972> (“Verizon SIP Presentation”).

¹² *AI Summit 2024 Schedule*, SIP FORUM, <https://www.sipforum.org/news-events/ai-summit-overview/schedule/> (last visited Nov. 15, 2024) (scroll to “Tuesday, May 7,” and below “1:30pm – 2:30pm,” click “Register Now” to view presentation recording; scan to 6:00–7:08) (“Verizon SIP Video”); Verizon SIP Presentation at 3.

¹³ Verizon SIP Presentation at 15.

¹⁴ *Id.*

III. THE RECORD SHOWS THAT NEW, AI-SPECIFIC RULES ARE UNNECESSARY TO DETER BAD ACTORS AND RISK CAUSING CONFUSION THAT WOULD UNDERMINE THE BENEFITS OF AI.

The record makes clear that, at this crucial early stage in the development of AI, regulators should take care to “strike a balance” between maintaining the incentive for innovation and protecting consumers.¹⁵ Many commenters agree that the Commission already has the tools it needs to take enforcement action against bad actors and that the proposals in the *NPRM* would ultimately stifle the development of AI—including development of use cases that would better protect consumers from bad actors. In lieu of the *NPRM*’s proposals, commenters encourage the Commission to coordinate with industry, advocate, and government partners to promote solutions that will enhance consumer trust.

A. The Record Confirms that the Commission Should Continue to Rely on Existing Authority to Police Illegal Callers and Senders That Use AI.

Commenters agree that the Commission can use its current statutory authority and rules, combined with those of government partners and the efforts of industry stakeholders, to protect consumers from AI-generated calls that use voice cloning.¹⁶ The Commission’s February 2024

¹⁵ ACA Connects – America’s Communications Association Comments at 7 (“ACA Connects Comments”).

¹⁶ *See id.* at 2; Twilio Comments at 2 (discussing *Implications of Artificial Intelligence Technologies on Protecting Consumers from Unwanted Robocalls and Robotexts*, Declaratory Ruling, 39 FCC Rcd 1783 (2024) (“*TCPA Declaratory Ruling*”)); NCTA – The Internet & Television Association Comments at 1 n.2, 3 (“NCTA Comments”) (referencing the various measures employed by NCTA members against abusive robocalls—including robocalls using AI—and the Commission’s *TCPA Declaratory Ruling*); ACA et al. Comments at 2 (discussing the *TCPA Declaratory Ruling* and other Commission rules); USTelecom Comments at 5–6 (describing government efforts at multiple levels, including the White House, Congress and state legislatures, the Federal Trade Commission, and the Commission and its Consumer Advisory Committee); Edison Electric Institute Comments at 2–3 (“EEI Comments”) (discussing the *TCPA Declaratory Ruling*); Future of Privacy Forum Comments at 2–3 (“FPF Comments”) (“Regulators are exploring ways to use their authority to address these emerging issues [related to AI]. The FCC, for example, fined the individual responsible for the AI-generated robocall impersonating President Biden”); CTIA Comments at 6–9 (citing various efforts by the wireless industry and various government entities).

TCPA Declaratory Ruling established clear guidance on the use of AI under the TCPA.¹⁷ The Commission has already relied on this clarification to protect consumers in a successful enforcement action against the sender of illegal AI-generated robocalls related to the New Hampshire primary election.¹⁸ That enforcement effort highlights the importance of close government and industry collaboration, as traceback data from the ITG was critical in identifying the provider originating the calls.¹⁹ CTIA thus agrees with the U.S. Chamber of Commerce (“Chamber”) that “recent state-level investigations triggered by high-profile uses of AI in the robocall context and Commission enforcement actions [show that] existing regulations and frameworks are sufficient to address any new risks.”²⁰ Many other commenters agree.²¹

B. The *NPRM*’s Proposals Risk Confusion that Will Harm Callers and Consumers and Undermine Innovative Solutions.

The record makes clear that the proposals in the *NPRM* risk doing “more harm than good.”²² Commenters explain that the proposed pre- and on-call disclosure requirements, along with the proposed unique consent requirements, risk confusing consumers and industry alike, creating an environment that succeeds only at dissuading innovative uses of AI.²³

¹⁷ See *TCPA Declaratory Ruling*, 39 FCC Rcd at 1784 ¶ 5. (“[T]he TCPA’s restrictions on the use of ‘artificial or prerecorded voice’ encompass current AI technologies that resemble human voices and/or generate call content using a prerecorded voice. . . . AI technologies such as ‘voice cloning’ fall within the TCPA’s existing prohibition on artificial or prerecorded voice messages because this technology artificially simulates a human voice.”).

¹⁸ See, e.g., *Steve Kramer*, Forfeiture Order, FCC 24-104 (rel. Sept. 30, 2024).

¹⁹ *Id.* ¶ 17; see also FCC, CAC, 2024 Report of the Federal Communications Commission Consumer Advisory Committee, CG Docket No. 23-362, at 7 (adopted Sept. 24, 2024) (describing the ITG’s involvement) (“2024 CAC Report”).

²⁰ U.S. Chamber of Commerce Comments at 2 (“Chamber Comments”).

²¹ See *supra* note 16 and accompanying text.

²² ACA Connects Comments at 6.

²³ See NCTA Comments at 4; INCOMPAS and the Cloud Communications Alliance Comments at 10 (“INCOMPAS and CCA Comments”); ACA Connects Comments at 6–7; Twilio Comments at 6–7.

For example, NCTA points out that the proposed definition of “AI generated” call “is not sufficiently targeted and would likely create confusion.”²⁴ With respect to disclosures, other commenters explain that bad actors are “unlikely to have sought express content [sic] to send [AI-generated] calls in the first place” and are unlikely to disclose their use of AI.²⁵ The Chamber notes that for lawful callers, the proposed consent requirement “establishes a misperception that AI-generated calls and texts pose more risks than they do.”²⁶ And INCOMPAS and the Cloud Communications Alliance note that “further information and disclaimers at the beginning of calls will exacerbate consumer annoyance at having to listen to multiple disclaimers.”²⁷

Even commenters that support or are neutral toward the *NPRM*’s proposal offer wildly varying modifications to the proposed rules that demonstrate the need for more evaluation and consideration. For example, Microsoft asks the Commission not to adopt the proposed definition of “AI-generated” call;²⁸ the National Consumer Law Center (“NCLC”) and other groups suggest a tiered system of consent and disclosure;²⁹ and some callers and policy advocates seek other modifications to the scope and parameters of the proposed rules.³⁰ These inputs illustrate that understanding the impact of AI is a complex task and that the Commission’s proposals are not balanced to both protect consumers and allow beneficial use cases of AI to flourish.

²⁴ NCTA Comments at 5; *see also* Twilio Comments at 7.

²⁵ ACA Connects Comments at 7; *see also* ACA et al. Comments at 2; ZipDX LLC Comments at 1.

²⁶ Chamber Comments at 3; *see also* ACA Connects Comments at 6–7; USTelecom Comments at 13.

²⁷ INCOMPAS and CCA Comments at 8.

²⁸ Microsoft Comments at 5–6.

²⁹ *See* National Consumer Law Center et al. Comments at 4–11 (“NCLC et al. Comments”).

³⁰ *See, e.g.*, EEI Comments at 3–5 (requesting carve-outs for certain texts and calls from utilities, including that any disclaimers be made at the end of calls); Center for AI and Digital Policy Comments at 8 (“CAIDP Comments”) (advocating for an opt-in system for AI-generated calls).

Rather than adopt the proposals in the *NPRM*, the Commission should follow the recommendations of its Consumer Advisory Committee and allow the record to further develop.³¹ CTIA encourages the Commission to monitor the development of AI and work with industry, consumer advocate, and government partners to use existing tools and frameworks to combat bad actors enhancing their tactics with AI before exploring any new rules.³²

C. The Commission Should Focus on Promoting Innovative Solutions to Enhance Protections from AI Threats.

Commenters explain how the wireless industry is constantly working to maintain and enhance consumer trust through innovative solutions that can protect consumers from scams, regardless of whether calls are made using AI.³³ The Commission should promote continued innovation in these efforts that are consistent with its goals to inform and empower consumers.

For example, the Commission should encourage the development of promising technologies such as RCD and branded calling solutions that show potential to enhance consumers' control over the calls they receive.³⁴ RCD incorporates "robust vetting practices" that align with industry trends toward KYC solutions to ensure "that the call originator is who

³¹ See 2024 CAC Report at 8 (recommending that the Commission "consider periodically seeking comment on the state of the AI-generated robocall and robotext threat environment and the technologies being used or developed to address these threats").

³² See *id.* at 3 ("The FCC should partner with other federal agencies and the White House to ensure that there is a comprehensive solution across all agencies that helps prevent AI from being used for malicious calling purposes."); Chamber Comments at 1 ("[T]he Commission should leverage existing law, collaborate with industry and other governmental entities as well as other stakeholders to further its understanding on AI, and utilize its current enforcement tools to combat bad actors.") (quoting U.S. Chamber of Commerce Comments, CG Docket No. 23-326, at 1 (July 19, 2024)); FPF Comments at 3 (encouraging the Commission to ensure that its efforts are "cohesive [with] and complementary" to other regulatory efforts); Twilio Comments at 10 (encouraging the Commission "to support the Administration's whole-of-government effort to establish guidance for managing risks associated with AI"); TNS Comments at 2; CTIA Comments at 11–14 (discussing the need for a coordinated approach with other agencies).

³³ Twilio Comments at 5; ZipDX LLC Comments at 4; CTIA Comments at 12, 16.

³⁴ Twilio Comments at 4; *see also* CTIA Comments at 11–12.

they claim to be.”³⁵ CTIA agrees with Twilio that “consumers would be better served by efforts to develop and implement RCD and branded calling solutions, which would provide helpful information about all calls in the network.”³⁶

Other techniques also show promise. As discussed above, Verizon uses “honeypots” to capture and analyze illegal robocalls to identify the callers and prevent further harms to consumers. In addition to its benefits, this approach avoids the potential privacy issues that may arise with solutions that analyze call contents in “real-time” because the calls being captured are highly likely to be illegal and are made to unassigned telephone numbers, and further because the honeypot notifies the caller at the outset that the content will be recorded.³⁷

Given the nascency of these and other developments, the Commission should refrain from adopting any regulations that may unduly burden these efforts and may stifle innovation in this emerging space. Indeed, the Commission’s Consumer Advisory Committee recommended that the Commission “continue to support voice service providers’ deployment of current and additional tools and processes to identify, block, label (as appropriate), and otherwise mitigate illegal and unwanted calls and texts.”³⁸ While one commenter suggests that the Commission could provide oversight in encouraging the transition from current caller ID technologies to RCD,³⁹ such an approach would be unnecessary given the on-going development of these solutions without regulatory intervention. Rather than adopting new rules, the Commission

³⁵ Twilio Comments at 4 (quotations omitted) (quoting Twilio, Inc. Comments, CG Docket No 17-59, at 4 (Sept. 8, 2023)).

³⁶ *Id.* at 9.

³⁷ Verizon SIP Video at 48:00–49:24.

³⁸ *See* 2024 CAC Report at 8.

³⁹ *See* Numeracle, Inc. Comments at 16–18.

should encourage the development of new tools to fight illegal robocalls that work alongside or build upon existing tools.

IV. THE RECORD SUPPORTS A CLARIFICATION THAT PEOPLE WITH DISABILITIES CAN USE AI WITHOUT RISK FROM THE TCPA.

The record illustrates the paramount importance of protecting the accessibility of communications networks by ensuring that people with disabilities can use AI technologies that facilitate access to those networks. Commenters broadly agree with the Commission’s initiative to ensure that the TCPA does not inhibit calls made by people with disabilities using AI technologies.⁴⁰ But several commenters, such as NCLC and InnoCaption, express concern that relying on the TCPA exemptions is overly complex and creates problematic limitations.⁴¹ Consistent with CTIA’s comments, the record demonstrates that the Commission should explore other options, such as clarifying that the definition of “artificial or pre-recorded voice” excludes this use of AI technology by people with disabilities.⁴² CTIA urges the Commission to consider this and other options, such as clarifying the scope of the *TCPA Declaratory Ruling*, while avoiding the creation of loopholes for bad actors.⁴³

⁴⁰ *NPRM* ¶ 19; *see, e.g.*, Apple Comments at 2–3; Mezmo Corporation D/B/A InnoCaption Comments at 1–3 (“InnoCaption Comments”); NCLC et al. Comments at 11; INCOMPAS and CCA Comments at 8–9; USTelecom Comments at 11–12; Microsoft Comments at 3–5; CTIA Comments at 14–15.

⁴¹ NCLC et al. Comments at 11 (pointing out issues with prepaid plans and numerical call limits); InnoCaption Comments at 2 (highlighting concerns about employment discrimination).

⁴² *NPRM* ¶ 29 (seeking comment on alternatives, such as a definitional exemption); *see* NCLC et al. Comments at 11; InnoCaption Comments at 2–3; Microsoft Comments at 4; INCOMPAS and CCA Comments at 9; USTelecom Comments at 11–12.

⁴³ CTIA Comments at 15 (advocating for further consideration to avoid creating loopholes).

V. THE RECORD CONFIRMS THAT THE COMMISSION SHOULD CAREFULLY CONSIDER THE PRIVACY RISKS OF DETECTING AND IDENTIFYING AI CALLS IN REAL-TIME.

Although real-time call detection technologies may show promise to protect consumers from evolving threats, many commenters explain that these technologies are still in development and present significant privacy considerations that must be addressed before they can be deployed.⁴⁴ CTIA agrees with recommendations that the Commission continue to monitor the development of these technologies before considering imposing any mandates or other regulation.⁴⁵ In the meantime, providers will continue to employ trusted and effective tools to identify and block illegal robocalls without compromising consumer privacy, as they are doing today.⁴⁶

VI. CONCLUSION.

The record in this proceeding shows that AI is being developed in ways that stand to deliver great benefits to consumers while also protecting them from harm, and that existing tools, frameworks, and partnerships can be used to bolster consumer protections. Moreover, commenters agree that the Commission already has demonstrated AI leadership by adopting its *TCPA Declaratory Ruling*, giving it more tools to continue protecting consumers from AI-enhanced scams. Commenters agree that it is unnecessary for the Commission to take further

⁴⁴ See FPF Comments at 3–4; USTelecom at 13; NCLC et al. Comments at 17–20; CAIDP Comments at 11–12; AARP Comments at 16–18; InnoCaption Comments at 4–5 (pointing out concerns with real-time call detection and monitoring technologies for people with disabilities); CTIA Comments at 16–17.

⁴⁵ See USTelecom Comments at 14; Twilio Comments at 9–10; NCTA Comments at 7–8; ZipDX LLC Comments at 4; Pindrop Security Comments at 7 (Sept. 23, 2024) (“[F]urther innovation, research, and development will be necessary to keep pace with calls that are fraudulent or that use AI-generated voice without disclosure.”).

⁴⁶ CTIA Comments at 16 (describing the wireless industry’s use of “reasonable analytics-based tools to identify and block illegal robocalls and advanced filtering tools to identify and block spam and scam messages before they reach consumers” that balance consumer protection and privacy).

steps to regulate AI-generated communications under the TCPA, especially given the risk of creating uncertainty, confusion, and chilling innovation. By monitoring and encouraging continued AI developments, rather than adopting the *NPRM*'s proposals, commenters agree that the Commission can promote the benefits of AI while also ensuring that consumers are protected.

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