



InCharge Systems, Inc.
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West Des Moines, IA 50265

VIA ECFS

Date: February 9, 2015

To: Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Reply Comments on CG Docket No. 02-278, WC Docket No. 07-135, and DA 14-1700

Dear Ms. Dortch,

InCharge Systems, Inc. (ICS) believes a potential national resource to help mitigate robocalling is perhaps being overlooked. There may be an approach worth considering that could complement existing robocall blocking technologies and help bridge the gap as we transition to a cryptographic based solution.¹

Suppose, for example, and for illustrative purposes only, that an NPA-level resource such as 899 were to be used for legal robocallers. Such a dedicated numbering range for legal robocalling, and in turn, a Legal Robocaller Registry, would allow for rapid and clear identification of potentially legal robocalls.

This Legal Robocaller Registry would provide the ability for legitimate robocallers to register their identities, calling numbers, and types of legal robocalls. This repository would be populated by legal robocallers, and consumers and legitimate robocall handling services would be able to query the registry for information about specific robocallers and calling numbers.

The information in the Legal Robocaller Registry could also be used by network operators and service providers. We think a national level resource, like 899, is worthy of consideration and could become part of a more effective robocalling mitigation solution.

Thank you for this opportunity.

Respectfully submitted,

/s/ Michael D. Hamilton

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¹ <http://apps.fcc.gov/ecfs/document/view?id=7520936614>