



The Fundamentals of Caller ID Scoring

A collaborative whitepaper developed by



Introduction

Primarily through STIR/SHAKEN regulations, the FCC has authorized carrier blocking and affirmative mitigation obligations as a means of cracking down on spam and illegal robocalls. These regulations have caused a seismic change in how legitimate businesses, especially call centers, conduct their calling campaigns. While these government actions have significantly reduced robocalls, they have also caused hardships for many trustworthy and compliant companies.

The best way to battle these adverse effects is to carefully maintain your company's reputation through your call behaviors. Careful monitoring of call lists, attention to agent training, telemarketing policies and procedures, and advanced technology are just some of the ways to protect your enterprise identity and brand reputation. Failure to prioritize call behavior can only lead to low answer rates, diminished consumer opinion, and even costly consumer litigation or regulatory enforcement actions.

Taking Control of Your Enterprise Identity and Brand Reputation

If your business depends on phone interactions with consumers, monitoring telephone usage behaviors is an imperative to optimize call completion rates. Communication service providers continuously evaluate usage behaviors, through data analysis and algorithms to determine if calls originated may be trusted based on the reputation associated with the telephone number used by the calling party.

Unfortunately, these datasets and algorithms are inconsistent. They vary from carrier to carrier and are often proprietary but adhere to certain basic rules. Still, these differences mean your caller ID will appear differently depending on the carrier placing receiving the call. Some IDs are more positive than others, and these differences can confuse consumers.

The call labeling presented to the consumer at the user interface (typically a smartphone) is inconsistent among carrier solutions, which is often confusing to the called party. In addition, two different carriers may label calls received from a given caller ID at the same time completely differently. For example, one may indicate "Scam Likely" whereas another may say something like "Nuisance Call". These differences can, and often do, confuse consumers, causing them to question any call that includes any form of labeling.

in your calling campaigns thereby improving connection rates and mitigating litigation and regulatory risk. In this way, you can establish more reputable numbers and inspire trust in consumers made wary by disreputable robo and spam calls.

Algorithms are at the center of the scoring systems and continue to adjust in this ever-evolving landscape. This flexibility is needed because scammers have shifted their strategies to beat increased government regulations and robust industry safeguards.

Unfortunately, the adaptations made by government agencies and phone carriers make it harder for businesses to maintain their legal and ethical responsibilities. Small businesses and even large enterprises can easily overlook new requirements despite their best efforts, leading to a poor score on some of their calls.

This white paper aims to help you identify weaknesses in your organization's calling practices with the help of industry experts, such as YouMail and [Brownstein](#), so you can correct them and maintain your brand's good reputation and avoid consumer complaints.

This paper will also provide insights into the impact of call labeling on phone call delivery and discuss strategies to prevent improper blocking and labeling of legitimate business calls.

Call Analytics: The [algorithms](#) phone carriers use can vary, but they generally use raw data to drive the call labels and analyze the call's authenticity. For this white paper, a flagged number is defined as one deemed "risky" and one that could be coming from an illegitimate and/or disguised source. If the call recipient sees a negatively labeled ID, such as "likely spam" or "scam," your company's reputation can be harmed, and call recipients will be unlikely to answer your calls.

The damage these labels can do to your company cannot be overestimated. Simply having your call come through as "unknown" is a serious problem. Research shows that [8 out of 10](#) Americans will not answer "unknown" calls. Negative call labels are simply bad for business in both the short and long term. That's why establishing a positive caller ID is vital to your company's success. Analytical companies take a dynamic approach to call labeling to protect consumers. They are proactive in identifying potential threats, so you must

stay active in monitoring the health of your calling campaigns. Establishing clear priorities when you review your calling practices will help identify numbers at risk of being blocked and labeled.

[YouMail Protective Services](#) (YouMailPS) utilizes a certain type of analytics known as “content-based analytics,” which relies upon inspection of the actual telephone call content to describe what has occurred. For example, a voicemail from a calling party that claims to be with the Social Security Administration may have analytics applied to determine the caller’s intent (e.g. determine if it’s really the SSA or a fraudulent caller).

Analytics of this type do not rely solely upon call related events such as signaling data, as with event-based analytics. While content-based analytics are based on the objective truth of what has happened, a source of potential error to consider is judgment about the content.



YouMailPS leverages this form of analytics to score telephone numbers on three dimensions: Spam, Unlawfulness, and Fraud:

Fraud

The YouMail Fraud Score is applied to telephone numbers to ascertain the probability of various forms of fraud including, but not limited to, brand impersonation. This data is suitable for customers who wish to mitigate calls from telephone numbers associated with robocall campaigns involving fraud such as brand impersonation. Mitigation may include network-level blocking.

Unlawful

The YouMail Unlawful Score is influenced by the Fraud Score but is not wholly reliant upon it as it also considers other forms of illegal calling including, but not limited to, violations of the national do-not-call registry (DNC list), the Telephone Consumer Protection Act (TCPA), and the Telemarketing Sales Rules (TSR), or state law. This data is suitable for customers that wish to mitigate calls based that are fraudulent and/or unlawful for other reasons such as violation of these federal and state telemarketing laws that limit calling certain persons or at certain times or frequencies. Mitigation may include network-level blocking.

Spam

The YouMail Spam Score is influenced by the Unlawful Score but is not wholly reliant upon it as it also considers other forms of deterministic and probabilistic data such as crowd-sourced feedback. This data is also suitable for customers who wish to manage calls with a high Spam rating, which may include call labeling or redirection to IVR or voicemail.

Reputation and Blocked Calls:

Whether your provider is STIR/SHAKEN compliant or not, your calls may receive adverse call treatment due to suboptimal telephone number reputation. For event-based analytics engines, reputation is largely determined based on signaling volume and frequency. For content-based analytics solutions such as [YouMail Protective Services](#), reputation is determined by behavior, including analysis of prerecorded audio used in conjunction with robocalls. [Caller ID Reputation's](#) analysis indicates an average of **32.4%** of business phone numbers are at risk of negative call labeling associated with robocall mitigation efforts.

This percentage can increase because of non-compliance on poor calling practices, such as omitting in call scripts certain disclosures required by the TSR or state law, failing to obtain appropriate calling consent, or scrub non-consented numbers against federal and state DNS lists, or calling at inappropriate hours. It is also important to note that crowd-sourced feedback has a bearing on the algorithmic determination of telephone number reputation, especially about the perceived **“spamminess”** of calls. As a result of these issues, one-third of telephone numbers are in danger of being adversely labeled before contact centers even commence an outbound calling campaign.

These poor odds above are unacceptable, especially when a company's campaigns are compliant, but yet telephone numbers are the victim of false-positive treatment on the



part of robocall algorithms. The onus is on your company to improve call completion rates. The first action in conducting outbound calls is to identify yourself to the analytical firms as a verified business and establish that your set of phone numbers is associated with a legitimate company. In addition, companies should ensure that their customer contact teams have appropriate and consumer-friendly written policies and procedures in place for outbound calling and that their customer outreach campaigns are consistent with favorable calling behaviors. Companies must also train their agents and audit for compliance. If your agent training and performance fail, your calls will result in negative labels, and you'll also likely end up with consumer lawsuits and government enforcement actions.



How Call Behaviors Shape Your Reputation.

Maintaining your reputation requires following federal guidelines and practicing excellent phone “hygiene.” The law has been refined over the years, most recently with **STIR/SHAKEN** legislation, but the enactment of the **TCPA in 1991** really ushered in call center regulation and related consumer litigation.

In the next section, we share some compliance, resources, and best practices you should be aware of.



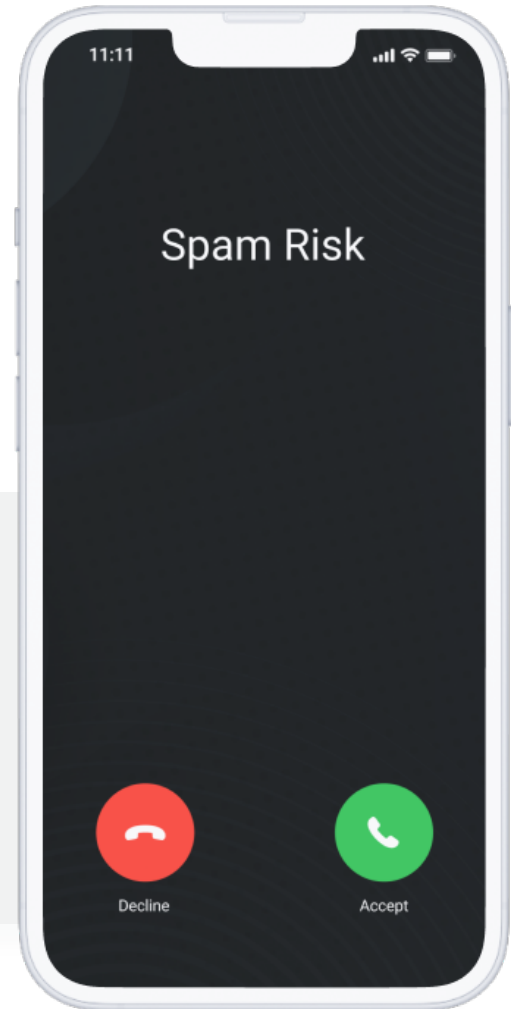
Brownstein

The TCPA regulations include, but are not limited to, the following:

- Prohibiting calling or texting cell phones using an autodialer or an artificial or prerecorded voice without the consumer's prior express consent. (If the call or text contains marketing, a specific type of prior express written consent is required.)
- Prohibiting artificial or prerecorded voice telemarketing calls to residential landlines similarly without prior express written consent.
- Imposing liability for calling or texting a reassigned number using an automated system without appropriate consent— unless the caller checked the number against the FCC Reassigned Number Database before calling, and the database said the number was not reassigned.
- Imposing certain disclosure and opt-out requirements on artificial or prerecorded voice messages.
- Limiting telemarketing call abandonment rates.
- Limiting telemarketing calls and texts with residential phone subscribers to between 8 a.m. and 9 p.m. at the subscriber's location.
- Requiring that anyone making a telemarketing call or text must institute certain minimum procedures for maintaining an internal DNC list of persons who request not to receive telemarketing calls or texts made by or on behalf of that person—including having a written policy for maintaining an internal DNC list that is available for consumers, training personnel in the existence and use of the internal DNC list, and recording and honoring consumers' DNC requests.
- Requiring the telemarketing agent must provide their name, the name of the company on whose behalf they're calling, and a telephone number or address where they can be contacted.
- Prohibiting telemarketing calls and texts to residential numbers on the national DNC list absent an established business relationship (EBR) with or prior express written consent from a consumer.



[<- Read more on compliance here](#)



While the TCPA is the most prominent law governing your call practices, it's far from the only one. For instance, companies making telemarketing calls must also comply with the TSR's comprehensive requirements. These include requiring disclosures of specific information before payment or sales pitch; requiring transmission of accurate Caller ID information; prohibiting misrepresentations or harassment; and requiring specific business records be kept. Many states also have their own telemarketing laws.

About 30 states restrict the use of automated telephony systems to make unsolicited marketing calls, including Florida with its onerous 'mini-TCPA.' Several states prohibit unsolicited marketing calls to cellphones regardless of the type of system used, and many states having texting-specific telemarketing limitations. Roughly a dozen states have their own DNC registries, and many states have calling time and date restrictions that can vary from the federal rules. Some state laws even have call content requirements, such as no rebuttal rules and disclosure of cancellation rights. The penalties for violations of these myriad laws are often harsh.



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In addition, you must tailor your call behaviors to the [FCC's STIR/SHAKEN](#) and related regulations. STIR creates a [digital signature](#) for each call that identifies the caller and lets the carrier verify authenticity. SHAKEN is the architecture carriers use to put STIR into action. It is important to note, however, that a STIR/SHAKEN signed call does not guarantee that the call is legal, only that the caller was authorized to use the number that appears in caller ID.

The two components prevent bad actors from disguising the origin of robocalls and spam calls, so consumers can trust what their caller ID systems display. Spoofing and other illegal calling behaviors have been greatly curtailed due to this legislation.

Attestation is an essential element of this authentication process. When you place a call, a SIP Identity header relays a secure token that the carrier can verify to ensure that the call origination data is correct. In short, they can tell that the call actually came from your company. The originating carrier awards the attestation rating for the call and then gives that rating to the consumer's carrier.

Your call will receive one of the following ratings:

A. Full attestation:

The call is fully authenticated. That is, that the originating carrier knows that the caller is authorized to use the number in the caller ID.

B. Partial attestation:

The carrier can authenticate its relationship with the caller but does not determine if the caller is authorized to use that number.

C. Gateway attestation:

The initiating carrier can authenticate the call was placed on its network, but it has no relationship with the caller.

Companies want a full attestation (A) rating to maintain their call reputation. Although your call may connect with a B or even a C, your answer rates and consumer confidence depend largely on a high rating. You need to make it easy for carriers to award you that A.

Below are specific calling behaviors that your agents must practice:

Supporting Favorable Calling Behaviors

Acquire appropriate consumer consent before making the call

Limit each phone to 100 calls per day

Ensure compliance with all national, state, and local laws

Keep call duration brief

Do not have agents disconnect prior to at least 15 seconds or four rings

Have prerecorded messages give recipients a clear way to opt out of further contact.

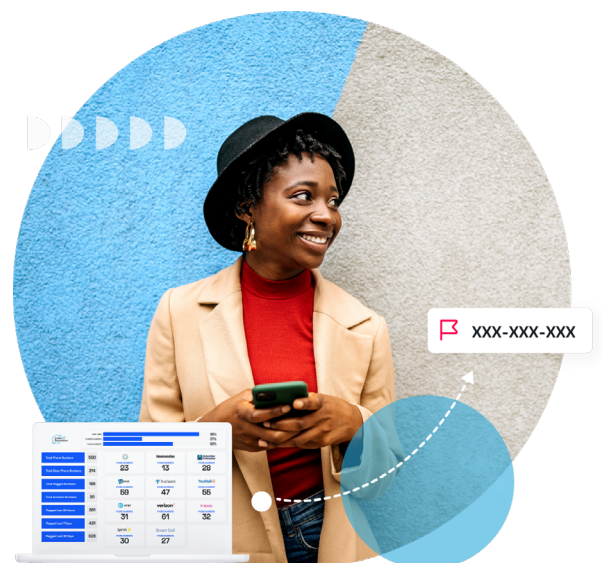
When using auto dialing, do not connect to multi-line businesses

Understand, process, and honor consumers' DNC requests

While your company needs to be well-versed in every law or regulation that applies to your telemarketing actions, these are some foundational rules every cold caller should know. Healthy behaviors lead to an organic improvement in your phone numbers' health. Sticking with the basics will help enhance your call reputation.

To monitor your reputation of outbound phone numbers at scale, Caller ID Reputation provides a comprehensive overview of your company's ongoing outbound call health across all carriers, industry data sources, and mobile operating systems.

Outbound numbers that show positive call health through longevity, high answer rates, and longer call duration foster trust with data aggregators and carriers.



Intended Target Audience: Know Your Client

Your target audience should shape all your calling behaviors. After all, your products and services are usually not for everyone. To be successful with your calling campaign, you should know the demographics of your intended audience and use them to determine the content of your scripts, your calling times, and your follow-up actions.

KYC (Know Your Client) is a key factor in your success. You should know exactly who they are and what they want. Targeting your audience also affects the “crowd-sourcing” determination, which can significantly influence your flagged scoring. Dozens, if not hundreds, of websites, share numbers that have been tagged spam or scam. If you make their lists, you will find it difficult to remove your number.

Simply taking these steps will help you avoid poor consumer feedback that results in your calls being flagged. For instance, if you’re promoting a product or service for working mothers, calling early in the morning or during dinner time in the evening will earn you poor marks. Also, make sure your number lists are “clean” and not already labeled. Resold number lists often contain flagged numbers that can harm your reputation.

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Remediation:

Determining what to do when your numbers are flagged

Despite your best efforts, some of your phone numbers will likely be flagged. Fortunately, you have options to correct these flags. Determining what to do when your numbers are flagged is key to protecting your company's calling reputation.

First, try to identify why your number was flagged. Usually, flags indicate your dialing lists were outdated or resold, your agents' interaction with consumers was problematic, or you contacted someone on a DNC list. Also, some flags are simply a mistake, a costly issue for your company. No matter what caused the flag, try to correct the problem.

Next, monitor your numbers so you can identify flags as soon as possible since flags tend to accumulate and get worse the longer they're ignored. You cannot afford to check your numbers once a week or every few days.

Instead, invest in [technology](#) that allows you to see what your call recipients see. You will be alerted instantly when one of your numbers receives a flag. The FCC requires carriers that block calls to notify you, but this requirement does not apply to flagged numbers. This is why investing in technology is critical. Once you identify a flagged number, you need to take [immediate steps](#) to remediate this issue.

Consider implementing the following steps:

- Remove the flagged number or numbers from your dialing rotation. Sometimes simply letting them cool off will eventually cause carriers to remove the flags, especially if they have been over dialed.
- Be certain you're not over-dialing numbers. One hundred calls per day is the limit.
- Scrub your lists against the DNC registry. Many lists still contain consumers who have opted out of these calls.
- [Audit](#) your calling process to spot any other irregularities. Over time, agents can become careless.
- Register your numbers on a CNAM database. You cannot afford to skip this step.
- Once you have found and corrected the problem, you can apply for flag removal by submitting a redress request to the carriers and call blocking applications. At [Caller ID Reputation](#), we have collected extensive redress information. That can be [found here](#).

Takeaways

The complexity of the flagging/labeling process is why you must carefully monitor all your calling campaign numbers and follow all FCC guidelines for placing calls to consumers. As you know too well, you can follow all the rules while practicing due diligence and still receive an erroneous flag. While you can seek redress, your best strategy is proactively protecting your reputation.

Remember these key reputation-enhancing concepts:

KYC (Know Your Client.) When you tailor your efforts to a targeted audience, you will have fewer complaints and more sales success

[Engage counsel](#) to adhere to laws, regulations, and best practices. You will be less likely to run afoul of call blocking apps, carrier flags, and governmental fines

[Monitor your reputation.](#) Use available technology to notify you when a number is flagged

Deal with issues as they arise or as soon as possible. A delay will only further damage your company's reputation

Properly manage your brand and those who have access to it. Even small problems can harm your company

Use a reputation management service.

[Caller ID Reputation](#)[®] provides comprehensive health monitoring for all your company's outbound phone calls and call connections.

[YouMail](#) complements your services with their product line that includes detecting spoofed phone calls involving hijacked telephone numbers and identifying instances in which DID/TFN are associated with unwanted robocalls.



Caller ID Reputation®

Don't let labels define your business. Caller ID Reputation® provides the most comprehensive aggregate of your business' call scores across all carriers, industry data sources, and mobileOS platform, to see how you are presented to your clients, at any time. Contact us today to take the first step in maintaining your brand integrity and reputation with the most crucial step in your customer's journey—the phone call.

www.calleridreputation.com



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