



## Client Profile:

NobelBiz provides long distance and call management services to high call-volume centers nationwide including teleservices companies, collection agencies and financial institutions.

## Headquarters:

Carlsbad, California

## Industry:

Telecommunications

## To learn more:

visit [www.NobelBiz.com](http://www.NobelBiz.com)

**“Thank you for an incredibly good outcome for NobelBiz.”**

**Ray Pollum**  
*NobelBiz, VP of Sales*

## The Challenge:

- *Track and analyze* proposed federal legislation
- *Gain insight* on prospects for movement and adoption by Congress
- Help our client *tell its story* before key legislators and, during separate rulemaking processes before the FCC and FTC
- Work to *ensure that final legislation and regulations distinguish* between legitimate business use of caller management technologies and spoofing by nefarious actors

**“It was important for us and for our clients that we get clarification of the intended purpose of this legislation,”**

**Rich Mahfouz**  
*NobelBiz, CEO*

As the inventor of LocalTouch™, a Caller ID Management Service for companies reaching out to customers, NobelBiz needed to track legislative initiatives targeted at spoofing or use of caller identification numbers for harmful purposes. Congress sought to restrict the deceptive and fraudulent spoofing practices by enacting federal legislation, called the Truth in Caller ID Act (S. 30 and HR. 1258).

NobelBiz turned to Kelley Drye for analysis of this proposed legislation, as well as strategic insight into the legislation’s prospects for movement and passage. As it became clear the Truth in Caller ID Act was likely to be enacted by the 111th Congress, Kelley Drye helped NobelBiz tell its story and educate legislators on the technology and the consumers who benefit from this technology. Equally important, Kelley Drye helped NobelBiz to identify and explain the potential for unintended consequences of the legislation to encompass and thereby restrict their legitimate business technology.

## The Team:

Telecommunications and consumer protection lawyers, and government relations professionals offering industry and agency expertise and connections combined with insight and access to legislative process.



**Robert J. Aamoth**  
*Chair, Telecommunications*



**Jodie Bernstein**  
*Of Counsel, Privacy and Information Security*



**Meg E. Hardon**  
*Senior Advisor, Government Relations and Public Policy*



**Greg McKenzie**  
*Partner, Tax*



**Gonzalo Mon**  
*Partner, Advertising and Marketing*



**Dana B. Rosenfeld**  
*Chair, Privacy and Information Security*



**Randall W. Sifers**  
*Associate, Telecommunications*



**Dana Wood**  
*Co-chair, Government Relations and Public Policy*

## Timeline:

**January 2009** – The Truth in Caller ID Act of 2009 (S. 30) is introduced in the U.S. Senate.

**March 2009** – The Truth in Caller ID Act of 2009 (H.R. 1258) is introduced in the U.S. House of Representatives.

**December 2010** – S. 30 passes in the House with clarification that the new law does not target use of Caller ID management services for lawful business practices, such as the LocalTouch service.

**December 2010** – S. 30 signed into law by President Obama. Moves to the Federal Communications Commission (FCC) for a period of analysis and recommendations on implementation.

**April 2011** – NobelBiz submits comments on the FCC rulemaking for the implementation of the Truth in Caller ID Act with the assistance of Kelley Drye.

**June 2011** – FCC issues official Report and Order to Congress regarding implementation of the Truth in Caller ID Act. FCC includes language clarifying the role of LocalTouch technology in providing legitimate business services and being outside the scope of the anti-spoofing law.

**July 2011** – NobelBiz provides documentation of the legislation and regulation to its existing and potential customers to demonstrate that regulators clearly excepted their service from the purpose and enforcement of the anti-spoofing Truth in Caller ID Act.