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CENTER

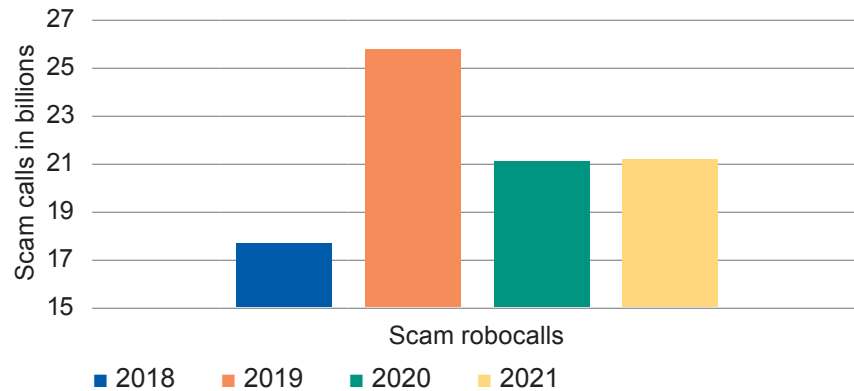
SCAM ROBOCALLS: TELECOM PROVIDERS PROFIT

<https://bit.ly/Rpt-ScamRobocalls>

TABLES

TABLE 1

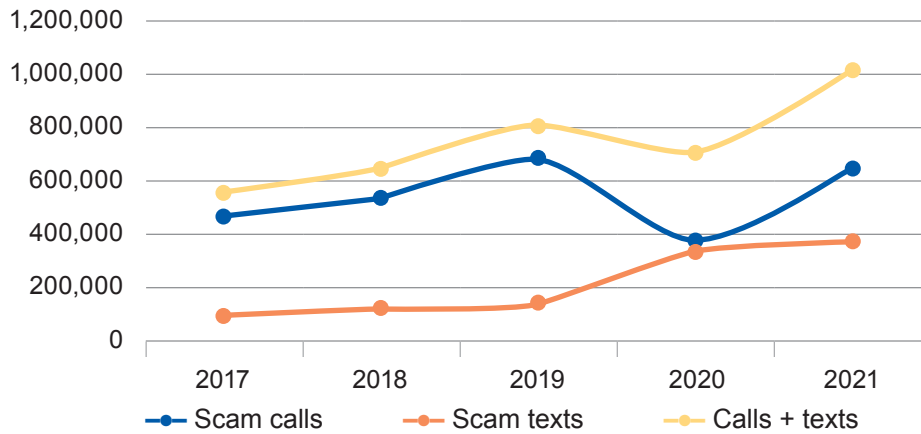
Total Annual Scam Robocalls 2018 Through 2021*



*According to estimates from YouMail, since 2018, no fewer than 45.87 billion robocalls have been sent to American phones in a calendar year, with no fewer than 37% and as many as 46% of these calls representing scam robocalls. Dividing this minimum annual number by 12 to approximate a monthly average, and assuming the minimum estimated percentage of 37%, our conservative estimate is that more than 1.4 billion scam robocalls are made to American phones every month. YouMail estimates that there were 47,839,232,200 placed in 2018, 58,536,224,700 placed in 2019, 45,866,949,500 placed in 2020, and 50,507,702,500 placed in 2021. YouMail, [Historical Robocalls By Time](#). YouMail estimates that 37% of robocalls placed in 2018 were scam robocalls. PR Newswire, [Nearly 48 Billion Robocalls Made in 2018, According to YouMail Robocall Index](#) (Jan. 23, 2019). YouMail estimates that 44% of robocalls placed in 2019 were scam robocalls. PR Newswire, [Americans Hit by Over 58 Billion Robocalls in 2019, Says YouMail Robocall Index](#) (Jan. 15, 2020). YouMail estimates that 46% of robocalls in 2020 were scam robocalls. PR Newswire, [Americans Hit by Just Under 46 Billion Robocalls in 2020, Says YouMail Robocall Index](#) (Jan. 26, 2021). YouMail estimates that 42% of robocalls in 2021 were scam robocalls. PR Newswire, [U.S. Phones Were Hit by More Than 50 Billion Robocalls in 2021, Says YouMail Robocall Index](#) (Jan. 6, 2022).

TABLE 2

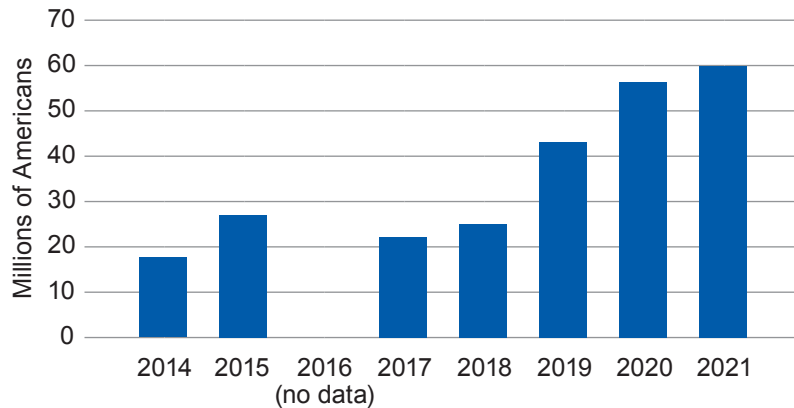
Rate of Complaints to FTC About Scam Calls and Scam Texts from 2017 to 2021.*



*FTC Consumer Sentinel Network, Fraud Reports by Contact Method, [Reports & Amount Lost by Contact Method](#) (updated Feb. 22, 2022) (Losses & Contact Method tab, with quarters 1 through 4 checked for years 2017 through 2021).

TABLE 3

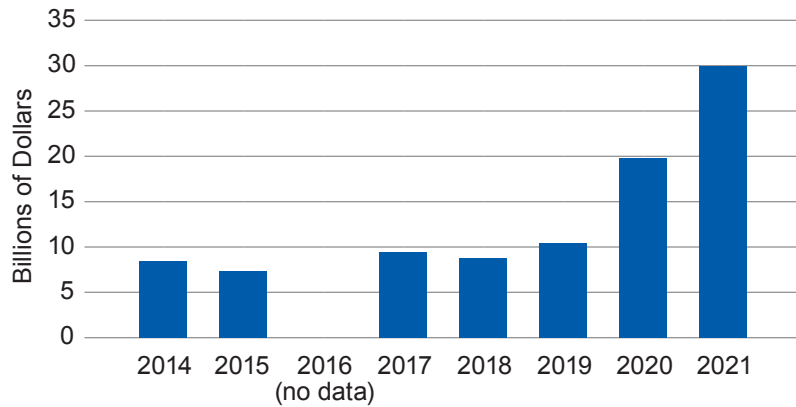
Number of Americans that Lost Money to Scam Calls*



*The 60% figure is consistent with Truecaller data. Truecaller, [Truecaller Insights 2021 U.S. Spam and Scam Report](#) (June 28, 2021) [hereinafter Truecaller Insights]. By quoting Truecaller's statistics, we are not endorsing Truecaller's business model, as we are aware of concerns that have been raised. See, e.g., Alfred Ng, CNET, [Those robocall blocker apps are hanging up on your privacy](#) (Aug. 10, 2019); Rest of World, [How Truecaller built a billion-dollar caller ID data empire in India](#) (Mar. 2022).

TABLE 4

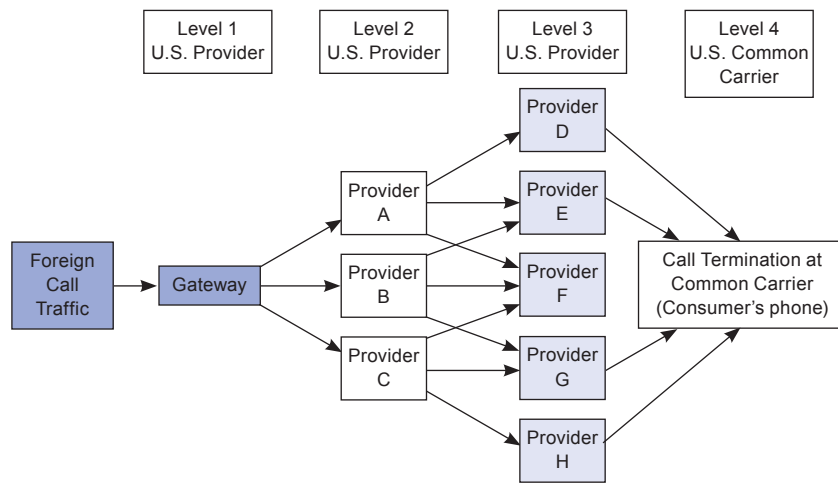
Total Losses from Scam Calls*



*Truecaller Insights, *supra* note 25. To underscore how severely fraud is underreported, compare Truecaller’s estimates of \$10.5 billion, \$19.7 billion, and \$29.8 billion for 2019, 2020, and 2021, respectively, with the FTC’s reported complaint totals of \$400,000 to \$700,000 per year for all scam calls over that same time frame. *N.B.* In both instances, these estimates include some live scam calls.

TABLE 5

Call Path from Foreign Originating Provider to Terminating Provider*



*Appendix to Complaint, United States of America v. Palumbo, Case 1:20-cv-00473, [Declaration of Marcy Ralston at 10-12](#) ¶ 22 (E.D.N.Y. Jan. 28, 2020) [hereinafter Declaration of Marcy Ralston] (“With modern telecommunications infrastructure, outbound VoIP calls do not take a defined path from their origin to the final destination. Rather, the system routes calls through automated equipment that determines the lowest possible connection cost at each routing step, depending on preexisting contractual relationships between the various entities. Typically, the company at each routing step will have numerous existing contracts through which it can route outbound calls through intermediate providers to the common carriers as the last routing step before an individual in the United States can answer the call. This automated routing process is called ‘least-cost routing.’”). Marcy Ralston, a Special Agent in the Social Security Administration’s Office of Inspector General, Office of Investigations, provided a sworn statement in *United States of America v. Palumbo*.

TABLE 6
Comparing Legal Robocalls to *Illegal* Robocalls*

LEGAL ROBOCALLS	ILLEGAL ROBOCALLS
Relatively high percentage of calls are answered	Low percentage of calls are answered
Legitimate telemarketer typically uses only a single caller ID for the entire telemarketing campaign or demographic. (This allows callers to track their calls)	Spoofed caller IDs, with caller ID-to-called-number ratios often fewer than 2 (meaning that each caller ID is used for 2 or fewer calls)
	Almost all calls are short duration, <ul style="list-style-type: none"> ■ averaging less than 20 seconds (because the called party hangs up or sends to voicemail) ■ 99% or more of calls last less than a minute ■ Fewer than 1% of calls last more than 2 minutes

*See *Re: Notice of Ex Parte Presentation by National Consumer Law Center, EPIC, Consumer Reports, National Consumers League, U.S. PIRG, and Public Knowledge to FCC Staff*, EC Docket No. 17-97, Call Authentication Trust Anchor; CG Docket No. 17-59, Advanced Methods to Target and Eliminate Unlawful Robocalls, at 4 (filed Feb. 10, 2022).