

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Call Authentication Trust Anchor) CG Docket No. 17-97
)
)

**COMMENTS OF
THE USTELECOM ASSOCIATION**

The USTelecom Association (USTelecom)¹ submits these comments in response to the Notice of Inquiry (Notice) released by the Federal Communications Commission (Commission) in the above-referenced proceeding.² Through its Notice, the Commission seeks comment on how it can further secure telephone networks against fraudulent calling activities by “facilitating use of methods to authenticate telephone calls and thus deter illegal robocallers.”³

While the Commission is currently considering network call blocking as one possible approach for combatting illegal robocalls, it correctly observes in its Notice that a “complementary and parallel task is to positively identify the bad actors making these calls.”⁴ The Commission’s Notice seeks to facilitate the development of standards to verify and authenticate caller identification for calls carried over an Internet Protocol (IP) network using the Session Initiation Protocol (SIP). Central to this effort is the development of two separate

¹ USTelecom is the premier trade association representing service providers and suppliers for the telecommunications industry. USTelecom members provide a full array of services, including broadband, voice, data and video over wireline and wireless networks.

² Notice of Inquiry, *Call Authentication Trust Anchor*, FCC 17-89 (released July 14, 2017) (*Notice*).

³ *Id.*, ¶ 1.

⁴ *Id.*, ¶ 3.

standards and best-practice implementations: 1) Signature-based Handling of Asserted Information Using toKENs (SHAKEN); and 2) Secure Telephone Identity Revisited (STIR).

USTelecom and its member companies support industry-led efforts to develop and deploy the SHAKEN and STIR standards and best-practice implementations. USTelecom has long maintained that the ability of scammers to easily spoof caller-ID information is key component of the illegal robocall scourge. For that reason, the association's member companies continue their work with both the Alliance for Telecommunications Industry Solutions (ATIS) the Internet Engineering Task Force (IETF) to develop the SHAKEN and STIR standards and best-practice implementations for secure call authentication. In addition to helping to improve the reliability of the nation's communications system by better identifying legitimate traffic, SHAKEN and STIR may also facilitate the ability of a variety of stakeholders to identify illegal robocalls and the sources of untrustworthy communications.

USTelecom has also long maintained that a broad-based holistic approach will be necessary to effectively address the robocall scourge. In addition to the development of the SHAKEN and STIR standards and best-practice implementations, industry is also moving across multiple other fronts to fight the robocall problem, including the deployment of a variety of tools, effectuating traceback efforts and a variety of other approaches. For this reason, the Commission should therefore encourage – but not mandate – authentication solutions, that are currently under development by ATIS, the SIP Forum and the IETF.

These venues – which include representatives from a broad range of industries, including cable, wireline, wireless and equipment manufacturers – are ideally suited for addressing the technologically complex and cross-industry impacts related to the development of the SHAKEN and STIR standards. Given the adaptive nature of the robocall threat, industry standards

development and responsiveness must be flexible and ongoing. This acknowledges the difficulty of predicting in advance the manner and means by which network providers will have to respond to robocall threats that change over time. As noted in the 2016 industry-led Strike Force report, “as the industry implements mitigation capabilities, robocallers will adapt and seek to work around solution as implemented and find new approaches.”⁵ Moreover, industry has already shown its strong commitment to the development of the SHAKEN standard, as demonstrated for example, by their acceleration of its development following the launch of the industry-led Robocall Strike Force.⁶

The robocall ecosystem involves a variety of global actors, and the Commission should therefore acknowledge that effective authentication efforts will ultimately depend on global participation and effort. The Commission should therefore recognize and acknowledge that a SHAKEN and STIR framework deployed exclusively within the United States will face intrinsic limitations given that many illegal robocalls originate from overseas.

The Commission should therefore support and promote international efforts to deploy the SHAKEN and STIR standards and best-practice implementations beyond domestic carriers. The Commission should leverage the results of the consensus authentication approach developed by ATIS, the SIP Forum and the IETF, and work to socialize and promote this effort with other international stakeholders and governments. Currently, only Canada and the United Kingdom, have taken an interest in robocall mitigation and the utility of the STIR/SHAKEN protocol, but most nations have to yet engage on this issue. In this regard, the Commission should avoid

⁵ See, Robocall Strike Force Report, October 26, 2016, p. 38 (available at: <https://transition.fcc.gov/cgb/Robocall-Strike-Force-Final-Report.pdf>) (visited August 14, 2017).

⁶ *Id.*, p. 3 (noting that the Strike Force accelerated, from December to October, the SHAKEN and STIR standards to verify and authenticate caller identification for calls carried over an IP network.).

imposing U.S.-centric approaches that may discourage other countries from participating in standards efforts.

The Commission in its Notice also appropriately seeks comment on issues related to cost recovery resulting from the implementation and deployment of SHAKEN and STIR standards and best-practice implementations. The Commission should acknowledge that cost recovery considerations will vary for individual voice service providers based on a variety of factors. As noted by the industry-led Robocall Strike Force, a “service provider’s robocall mitigation costs will vary dependent on the technical architecture of a provider’s network, the size of their network, the solutions they choose to employ, and the business relationships they have with their vendors and third party solution providers.”⁷

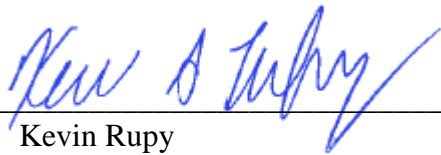
Conclusion.

USTelecom continues to support Commission and industry efforts to combat the scourge of illegal robocalls. The Commission’s Notice represents an additional front on this battle whereby the nation’s telephone networks can be further secured against illegal robocall activities by facilitating use of methods to authenticate telephone calls. As it moves forward in this proceeding, the Commission should encourage industry-led efforts to voluntarily deploy the SHAKEN and STIR standards and best-practice implementations, while also coordinating with international stakeholders who are also essential partners in this area.

⁷ *Id.*, Attachment 1, p. 38.

Respectfully submitted,

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