

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Advanced Methods to Target and |) | CG Docket No. 17-59 |
| Eliminate Unlawful Robocalls |) | |

**COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Public Notice* released June 20, 2018, in the above-referenced docket. ATIS comments below provide an update on industry efforts to further develop a call authentication trust anchor, including efforts to set up a SHAKEN Governance Authority, the publication of a new technical report detailing operational and management considerations for SHAKEN Certification Authorities and Policy Administrators and efforts by the industry to test SHAKEN implementations.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS’ diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service

providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the Long Term Evolution (LTE) and LTE-Advanced wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS PTSC develops standards related to services, architectures, signaling, network interfaces, next generation carrier interconnect, cybersecurity, lawful intercept, and government emergency telecommunications service within next generation networks. As networks transition to all-IP, PTSC will evaluate the impact of this transition and develop solutions and recommendations where necessary to facilitate and reflect this evolution.

ATIS PTSC also works jointly with the SIP Forum under the auspices of the Joint IP – Network to Network Interconnection (IP-NNI) Task Force. This task force developed the SHAKEN (Signature-based Handling of Asserted information using toKENs) specification, which defines a digital signature to verify a calling number and specifies how it will be transported in SIP “on the wire.” Working together with the IETF's STIR (Secure Telephony Identity Revisited) standards, STIR/SHAKEN offers, for the first time in the network, a practical mechanism to provide verified information about the calling party as well as the call's origin.

ATIS NGIIF provides an open forum to encourage the discussion and resolution of industry-wide issues associated with the operational aspect of telecommunications network interconnection and interoperability, and the exchange of information concerning relevant topics, such as network architecture, management, testing and operations, and facilities.

II. COMMENTS

The *Public Notice* seeks comment on the progress of robocalling mitigation initiatives. As the primary architect of the SHAKEN ecosystem, ATIS is pleased to provide an update on this effort.

SHAKEN Governance Authority. On May 3, the North American Numbering Council submitted to the Commission the final report of its Call Authentication Trust Anchor Working Group. The report recommended that the industry collaboratively form a Secure Telephone Identity Governance Authority (STI-GA), which would be managed by an industry-led Board. The report also identified stakeholders that could serve on this Board and established a set of milestones for the development of the SHAKEN ecosystem, including an expectation that the STI-GA should be established within three months of the submission of the report.

Following the submission of this report, the stakeholders identified in the NANC working group met to discuss the formation of the STI-GA. The stakeholders recommended that this effort be established under the auspices of ATIS. Each of these stakeholders has appointed a representative to the STI-GA Board, and the appointees have commenced holding discussions. ATIS and these stakeholders are working to establish the details of the STI-GA operations. Among the details that are being discussed are the operating procedures for the STI-GA and its Board and Technical Advisory Committee, and the financial commitments necessary to perform the STI-GA functions.

SHAKEN Technical Specifications. As has been noted previously by ATIS, there have been two foundational SHAKEN technical specifications that have been produced by the joint ATIS/SIP Forum IP-NNI Task Force. These are:

- *Signature-based Handling of Asserted information using toKENs (SHAKEN)*, which was jointly published by ATIS and the SIP Forum in January 2017 (ATIS-1000074); and
- *SHAKEN: Governance Model and Certificate Management*, which was jointly published in June 2017. The SHAKEN governance model identifies the key roles/functions involved in distributing and managing SHAKEN certificates (ATIS-1000080).

The ATIS/SIP Forum IP-NNI Task Force has also completed work on a technical report on *Operational and Management Considerations for SHAKEN STI Certification Authorities and Policy Administrators* (ATIS-1000084).¹ This technical report introduces operational and management considerations for STI Certification Authorities (STI-CAs) within the context of the SHAKEN framework and the *SHAKEN: Governance Model and Certificate Management* framework. The document addresses the STI Policy Authority (STI-PA), operational aspects of managing the list of STI-CAs and authorization of Service Providers to obtain STI certificates.

Testing. ATIS is also facilitating the testing of SHAKEN implementations via the ATIS Robocalling Testbed, hosted by the Neustar Trust Lab. This testbed serves as the industry interoperability test facility to validate the effectiveness of industry implementations of SHAKEN and is open to any service provider with an assigned Operating Company Number (OCN) as well as other stakeholders with solutions relevant to the SHAKEN framework. To date, 27 industry participants have formally expressed interest in the testbed, three (3) of these companies are in the process of testing and ten (10) of these have completed testing.

Finally, ATIS notes that the Commission also seeks input on the availability and any limitations of any existing robocall mitigation tools. ATIS notes that there is a diverse array of robocall tools currently available, including network and consumer applications. At the April 23, 2018, joint FTC/FCC Stop Illegal Robocalls Expo on robocall technologies, there were

¹ This draft technical report is expected to be published in July 2018.

demonstrations from a number of companies, including AT&T, Call Control, Comcast, Digitone Communications, First Orion Corp., Hiya, Neustar, Nomorobo, Reverd LLC, Scammer Jammer, South Coast Telecom Inc., TelTech Systems, T-Mobile, TNS, Verizon, VTech Communications, Inc., and YouMail.

III. CONCLUSION

ATIS appreciates the opportunity to provide its updates to the *Public Notice* and urges the Commission to consider the input above.

Respectfully submitted,



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