

**Answers to the Questions Received Regarding the RFP for the STI-PA
December 21, 2018**

1. Could you please clarify whether or not "SP certificates" as mentioned in the RFP documents are in fact STI certificates as defined in the relevant ATIS documents?

Answer: *The RFP does not use the term "SP Certificates". The closest is RFP (Section 1.6) which says: "The SHAKEN Governance Model (ATIS-1000080), ... defines protocols and certificate management procedures ... to support management of SP-level certificates within the SHAKEN framework". In this instance, "SP-level certificates" does in fact mean "STI certificates" as defined in the relevant ATIS specifications. Note that STI certificates are not the same as Service Provider Code (SPC) tokens. STI certificates are used to authenticate/verify the information in SIP Identity headers. Service Provider Code tokens are used by service providers to authenticate their identity to obtain STI certificates from STI-CAs.*

2. Could you please clarify the current understanding of the STI-PA's expected roles and responsibilities in handling CRLs, given that the approach to handling CRLs is under discussion in the IP-NNI (see IPNNI-2018-00139001.docx)?

Answer: *There are three possibilities:*

- a) *The IP-NNI will have clarified the roles, responsibilities, and format for the Certificate Revocation List (CRL), in which case this will be part of the initial contract with the STI-PA*
- b) *The roles, responsibilities, and format for the CRL will still be under discussion in the IP-NNI TF, in which case this will be handled under the defined change management process*
- c) *The expected CRL processes will follow standard industry practices with only minor variation*

In any case, the Respondent should provide a qualified response offering as much detail as feasible given the state of progress in the IP-NNI TF. (Please see supplementary note on CRL.)

3. Several sections of the RFP refer to an agreement to be executed between the STI-PA and the STI-GA. What is the legal entity with whom the STI-PA will be contracting?

Answer: *The STI-PA will be contracting with the STI-GA. Currently, the STI-GA operates under the auspices of ATIS, but it is actively evaluating the optimal long-term corporate structure. The objective is to establish the long-term corporate structure before the contract is executed with the STI-PA. It is anticipated that the STI-PA agreement will be executed between the winning bidder and this new corporate structure.*

4. Question 24 of the RFP states "that the Respondent must agree and acknowledge that the STI-GA Board is not granting any exclusive right to provide services". Why has the STI-GA effectively prohibited exclusivity agreements with the STI-PA? Is the STI-GA Board contemplating multiple STI-PAs?

Answer: *The FCC’s North American Numbering Council’s (NANC) Call Authentication Trust Anchor (CATA) Working Group report explicitly recommended that “... the contract should be ... non-exclusive.” This working group also recommended that the IP-NNI TF evaluate the feasibility of having more than one STI-PA. Therefore, while the STI-GA is not actively contemplating multiple STI-PAs at present it is not precluding the possibility at some point in the future.*

5. For the acceptance testing, REQ 1 (STA-PA RFP, section 4.1), who will approve the acceptance testing?

Answer: *The STI-GA Board and Technical Committee will approve acceptance testing.*

6. Will the Certificate Policy written by the STI-PA be based on the STI-GA trust authority policy and approved by the STI-GA?

Answer: *Yes. The STI-PA will be responsible for generating a detailed Certificate Policy, based on the STI-GA trust authority policy, which in turn is based on the recommendations of the IP-NNI TF – specifically ATIS-1000084. The detailed Certificate Policy will also be formally approved by the STI-GA to ensure it is consistent with the technical documents and the latest requirements.*

7. Is there a limit on number of CAs that will be approved?

Answer: *No, there is no predetermined limit on the number of CAs.*

8. What legal entity will the selected STI-PA contract, invoice, and receive payment from for this project?

Answer: *The STI-PA will contract with, invoice, and receive payment from the STI-GA.*

Currently, the STI-GA operates under the auspices of ATIS, but it is actively evaluating the optimal long-term corporate structure. The objective is to establish the long-term corporate structure before the contract is executed with the STI-PA. The specific legal entity that will contract, invoice and receive payment from this project will depend on the corporate structure adopted by the STI-GA.

It is also worth noting that the STI-PA may be required to collect fees from all service providers participating in the SHAKEN ecosystem on behalf of the STI-GA, based on a formula that is still under evaluation.

9. To the extent the legal entity is a newly formed LLC or other corporation, how will this entity be capitalized? What is the source of funding for the project?

Answer: *The funding for the first two years of operation of the STI-GA has been committed by the current STI-GA Board members and the associations that appointed them. The long-term funding model is currently under study.*

10. Section 1.4: Regarding submission of confidential information, will an NDA be executed prior to bid submission?

Answer: *There will be no NDA executed prior to submission. However, the STI-GA does not plan to publicly release bidder information.*

11. Section 8.3.1: At implementation, what is the anticipated number of SPs participating?

Answer: *The STI-GA Board is not in a position to determine individual companies' participation or implementation plans. More information may be available from the FCC on this matter: [CG Docket No. Docket 17-59, In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls](#). [CG Docket No. Docket 17-97, In the Matter of Call Authentication Trust Anchor](#)*

12. Section 8.3.1: Post implementation, what is the anticipated "up-take" for the next 12 months? 3-5 years?

Answer: *The STI-GA Board is not in a position to determine the individual companies' participation or implementation plans. More information may be available from the FCC on this matter: [CG Docket No. Docket 17-59, In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls](#). [CG Docket No. Docket 17-97, In the Matter of Call Authentication Trust Anchor](#)*

13. Describe the change control regarding policy management between the STI-GA and STI-PA

Answer: *The Change Management process is outlined in the Technical Requirements Document, Section 2.11 (page 18-19).*

14. Is the selected STI-PA expected to abide by updates to task group documents, in particular with regards to CRL handling?

Answer: *Per the Respondent Qualification document (Question 16), any changes to the specifications subsequent to the issuance of the RFP and prior to the turn-up of the system described in the RFP MUST be incorporated into the proposed system platform and ready for implementation at turn-up, while any updates or changes after that date would follow the Change Management process (outlined in Section 2.11 of the TRD). (Please see supplementary note on CRL.)*

15. Section 5 of ATIS-1000084 states the following with regards to the PMA role: "In a multi-stakeholder PKI model, typically a Policy Management Authority (PMA) is

established, comprising a set of people responsible for ensuring that the established policies are being adhered to. The set is typically comprised of the stakeholders (e.g., service providers in the case of SHAKEN). The PMA defines a CP to be supported by the approved STI-CAs. The STI-CAs provide a CPS describing their adherence to the CP during the approval process. An outline of the CP to be supported by the STI-CAs is provided in clause 6.1. Sections 2.3, 2.4 and 2.5 of the TRD appears to read as if whomever receives the PA contract also serves as the PMA. In this case, is it expected that whomever serves as the STI-PA establish a PMA, with oversight by the STI-GA board, or is it expected that rather than being comprised of industry stakeholders, the PA uses internal expertise to develop the CP and evaluate the CPS, as well as performing periodic audits?

Answer: *It is expected that whomever serves as the STI-PA will establish a PMA, with oversight by the STI-GA board. It is anticipated that the STI-PA will also use internal expertise to develop the CP (ATIS-1000084 provides an outline, not a prescriptive CP) for approval by the STI-GA.*

16. RFP Section 1.4 – Please confirm that no information included in (at least) an initial RFP response will be treated confidentially.

Answer: *While the STI-GA will not be executing NDAs pertaining to RFP responses, it does not plan to publicly release bidder information.*

17. RFP Section 1.6 (Clause 4) – Please confirm that these restrictions only apply to scope of this RFP (i.e., the U.S. STI-PA).

Answer: *Yes, these restrictions only apply to operations and legal entities within the U.S. and its territories and does not include other countries within the NANP.*

18. RFP Section 7.1 – What is the anticipated charging model to fund STI-PA (e.g., carrier participation fees)? Please confirm that any additional referenced charges to fund the STI-GA are incremental to any agreed to STI-PA vendor funding.

Answer: *The charging model is still being finalized by the STI-GA, but a “carrier participation fee” (a fair and equitable distribution based on some yet-to-be-defined metric) is one of the models under consideration. The charges to fund the STI-GA are definitely incremental to STI-GA vendor funding – the price to be quoted in the RFP response should be limited to the cost for the STI-PA function.*

19. RFP Section 7.3 – Please clarify that STI-GA is just not liable to pay for any other services or amounts outside the agreed to pricing schedule.

Answer: *This is correct. The STI-GA has no obligation to pay for any services or amounts outside of those identified in the agreement to be executed between the STI-GA*

and STI-PA. It is anticipated that the STI-GA will make no payments to the STI-PA, with the STI-PA cost recovery model based instead on a “carrier participation fee.”

20. RFP Respondent Qualification Section 3.3, Question 15 – Please confirm when turn-up is expected. Are required STI-PA development/process changes leading up to turn-up expected to be made at no additional charge?

Answer: *Turn-up is expected as early as practical. An early turn-up date will be one of the factors considered when selecting the winning bid. And yes, required STI-PA development/process changes, based on changes to the specifications, before turn-up are expected to be made at no additional charge.*

21. RFP Respondent Qualification Section 3.2, Question 18 – Please clarify the Intellectual Property Rights (IPR) ownership for vendor-developed STI-PA software.

Answer: *Intellectual Property Rights (IPR) issues will be addressed in the contract to be executed between the STI-GA and STI-PA. The RFP does not preclude bidders from proposing the use of patented technologies or other IPR in their responses.*

22. RFP Respondent Qualification Section 3.2, Question 24 – Please clarify that this question leaves the door open to have more than one STI-PA. If so and added during a contract term, then please confirm that this wouldn't impact existing STI-PA fees being collected.

Answer: *The FCC's North American Numbering Council's (NANC) Call Authentication Trust Anchor (CATA) Working Group report explicitly recommended that "... the contract should be ... non-exclusive." This working group also recommended that the IP-NNI TF evaluate the feasibility of having more than one STI-PA. Therefore, while the STI-GA is not actively contemplating multiple STI-PAs at present, the STI-GA is not precluding this possibility at some point in the future. If multiple STI-PAs were to be permitted in the future, this would not impact the existing fees being collected by the STI-PA under the existing contract.*

23. RFP Respondent Qualification Section 4 – Please confirm that the RFP response needs to include both a vendor's costs and its pricing.

Answer: *Yes, Section 4.1 specifically states, “Among other important business drivers, the plan should include **all revenue and cost assumptions** (including all start-up and initial costs, expenses, and fees) and a pricing model through 2024 (five (5) years, starting 2019).”*

24. RFP Respondent Qualification Section 4.3 – Please clarify intent with STI-PA functionality since STIR/SHAKEN and a form of governance may be deployed globally.

Answer: *The STI-GA is focused solely on the deployment of the SHAKEN ecosystem in the U.S. However, this deployment is based on a clear understanding that this ecosystem may be part of a larger global implementation. Therefore, the STI-GA is considering*

both how the U.S. ecosystem interacts with other U.S. entities that are part of the SHAKEN ecosystem operating in the U.S. and how it interacts with software and storage components that may be outside the U.S.

The RFP should be interpreted as applying only to the implementation of the U.S. STI-PA.

Supplementary Note on the CRL:

Several questions mentioned specifications that are still under development, in particular, the new requirement for the STI-PA to maintain and distribute a certificate revocation list (CRL). Please note the following points in this regard:

- *The Technical Requirements Document (TRD), in Section 2, notes that “all requirements applicable to the STI-PA in the ATIS SHAKEN Specifications must be satisfied even if not explicitly addressed in the sections of this RFP.” Therefore, the Respondent must fully understand the ATIS SHAKEN Specifications, in addition to the contents of the TRD, in responding to this RFP.*
- *The Respondent Qualification document, Question 15, states that “any changes to the specifications subsequent to the issuance of the RFP and prior to the turn-up of the system described in the RFP, MUST be incorporated into the proposed system platform and ready for implementation at turn-up as part of the services to be offered under any agreement to be executed between the STI-PA and STI-GA.” Therefore, Respondents should be actively tracking progress in all IPNNI TF documents to ensure they incorporate the latest technical specifications in their bid. In particular, the following documents are currently being revised, and are expected to be approved in 1Q2019, and Respondents will therefore be responsible for implementing all changes in the proposed system:*
 - *ATIS-1000074 errata: see IPNNI-2018-00147*
 - *ATIS-1000080 revisions: see IPNNI-2018-00150*
 - *ATIS-1000084 revisions: see IPNNI-2018-00151*
- *The changes in the above documents that specifically relate to CRL predominantly appear in Section 1.9 and 2.6 of the TRD. The proposed changes would mean that rather than distributing a list of approved STI-CAs and a CRL in a direct interface between the STI-PA and the STI-VS, it is expected that the revised specifications will have the STI-PA distribute a URL to the STI-VS, indicating where the approved STI-CAs can be found. The URL pointing to the CRL will further be included in the Service Provider Code (SPC) token, and the service provider will then be responsible for communicating this information to the STI-VS function. Respondents should track the documents in the IPNNI TF and implement accordingly.*