

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

In the Matter of	)	
	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
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**REPLY COMMENTS OF THE ALLIANCE  
FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS), hereby submits these reply comments in response to the *Notice of Inquiry (NOI)*, released July 14, 2017, in the above-referenced docket. As a key stakeholder in the development of technical and operational standards pertaining to unlawful robocalling, ATIS is pleased to have the opportunity to respond to the comments in this proceeding. In its reply comments, ATIS: (1) notes that there is widespread opposition to the establishment of regulatory mandates regarding the implementation of Signature-based Handling of Asserted information using toKENs (SHAKEN); (2) notes that there is significant support for an industry-led, multi-stakeholder SHAKEN governance authority; and (3) supports the use of Operating Company Numbers (OCN) as a criteria to determine whether service providers are eligible to sign calling party information.

## I. COMMENTS

In its comments, ATIS explained that it does not believe that further regulatory action by the Commission is necessary at this time because market forces are sufficient to encourage the continued adoption of SHAKEN. While there is no need for new regulatory mandates, ATIS did acknowledge that the Commission has important roles to play in assisting the industry to educate consumers on the availability of new call authentication tools, educating service providers on the availability of these new tools and enforcement of Commission existing rules and policies against bad actors.<sup>1</sup>

ATIS' views on this matter are strongly supported by many commenters. CTIA and US Telecom urge the Commission to encourage but not mandate authentication.<sup>2</sup> Neustar explains that "it is premature for the Commission to mandate that the industry deploy STIR/SHAKEN."<sup>3</sup> The Internet and Television Association (NCTA) supports this view, noting that it would be premature for the Commission to lock in specific regulatory or technical requirements at this time because a complete transition of voice networks to IP-based technology is still years away.<sup>4</sup> Telcordia Technologies notes that regulatory mandates are not necessary because there are existing rules that address the passing of caller ID and SIP header information throughout the call path and the ability to move SHAKEN forward is not dependent on a formal governmental mandate.<sup>5</sup>

In its comments, ATIS proposed that governance authority for SHAKEN be established and operated by the industry under the umbrella of a multi-stakeholder industry organization

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<sup>1</sup> ATIS Comments at p. 3.

<sup>2</sup> CTIA Comments at p. 2; US Telecom Comments on p. 2.

<sup>3</sup> Neustar Comments at p. 2.

<sup>4</sup> NCTA Comments at pp. 2-3.

<sup>5</sup> Telcordia Technologies Comments at p. 3.

such as ATIS.<sup>6</sup> Under this construct, the industry would use consensus-based, open, and transparent procedures to manage the ecosystem in a way that would leverage industry technical expertise to analyze the implementation of SHAKEN by the industry and, as necessary, to address emerging issues before they become significant challenges. ATIS believes that it is well-suited to serve in this role.

ATIS' proposed hybrid approach is supported by many commenters. NCTA notes that, while it believes that it is premature for the Commission to designate which entity should serve as the governance authority, the Commission should "strongly consider following the recommendation of ATIS to take a 'hybrid' approach to governance in which the Commission would endorse the creation of an industry-developed multi-stakeholder group."<sup>7</sup> CTIA also supports regulatory endorsement of the ATIS-proposed hybrid approach, noting that this structure would allow the industry to retain the flexibility necessary to respond to evolving challenges and pursue new approaches."<sup>8</sup> Similarly, Comcast notes its support for the ATIS hybrid governance model under which the Commission would provide explicit regulatory direction or implicit regulatory endorsement of an industry approach but leave the governance and management of SHAKEN/STIR to a "neutral industry body representing a full range of stakeholders."<sup>9</sup>

ATIS notes that some comments suggest that the North America Numbering Council (NANC) should serve as the governance authority.<sup>10</sup> ATIS does not support assigning governance authority responsibilities to the NANC for several reasons. First, ATIS believes that,

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<sup>6</sup> ATIS Comments at pp. 7-8.

<sup>7</sup> NCTA Comments at p. 3

<sup>8</sup> CTIA Comments at p. 2.

<sup>9</sup> Comcast Comments at pp. 7-8.

<sup>10</sup> *See* Neustar Comments at p. 2.

in order for the governance authority to be effective, it must be separate from (although endorsed by) the Commission. NANC, as one of the Commission's federal advisory committees, would likely not offer the flexibility for the industry to act to quickly address evolving challenges. Instead, decisions made by the NANC would still require formal Commission action in terms of a rulemaking or inquiry before the industry could implement these decisions. Second, ATIS believes that NANC already has its plate full with existing numbering related issues, including the modernization of the administration of the NANP and policy-related recommendations associated with continued evolution of communications networks. Similarly, ATIS does not believe that the current representatives to the NANC are necessarily the appropriate subject matter experts to address issues associated with the implementation of SHAKEN by the industry. Such work is more appropriately addressed by those experts that have been involved with the development of the underlying technical specifications, rather than by numbering experts. This is similar to the way that the industry already addresses numbering issues associated with industry guidelines— these issues are primarily worked through open industry forums such as ATIS' Industry Numbering Committee (INC).

ATIS notes that some commenters have questioned the use of OCNs as the criteria for receiving SHAKEN certificates.<sup>11</sup> ATIS reiterates its support for the use of OCNs as the criteria for receiving SHAKEN certificates, a view shared by commenters such as CTIA.<sup>12</sup> As ATIS noted in its comments, OCNs are a reliable and clear criteria for the initial deployment of SHAKEN that will help to prevent bad actors from undermining the system. To the extent that there may be unique cases in which different criteria may be appropriate, ATIS maintains that

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<sup>11</sup> See Neustar Comments at p. 3 and Noble Systems Comments at pp. 4-5.

<sup>12</sup> CTIA Comments at p. 6.

the governance authority will be able to better identify and address other legitimate criteria once the industry gains operational experience with SHAKEN.

Finally, ATIS notes that some commenters have indicated that they did not participate in the Secure Telephone Identity Revisited (STIR)/SHAKEN standards process. It should be noted that STIR was developed by the Internet Engineering Task Force (IETF), which is an open standards body, and the service provider implementation (SHAKEN) was developed by the ATIS/SIP Forum Joint Network-to-Network Interoperability (IP-NNI) Task Force, where participation is open to all.

## **II. CONCLUSION**

ATIS appreciates the opportunity to provide its further input to the *NOI* and urges the Commission to consider the recommendations above.

Respectfully submitted,



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