

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

In the Matter of	)	
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17–59
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17–97
	)	

**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 December 20, 2019, in the above-referenced docket. The *Public Notice* seeks input for a staff report on call blocking, including the impact of call blocking on 911 services or public safety. ATIS’ comments provide information on industry work to mitigate impacts on 911 public safety calls from call blocking.

**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, wireline, and VoIP 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' Packet Technologies and Systems Committee (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. ATIS PTSC also works collaboratively with the SIP Forum and has jointly developed the SHAKEN series of standards, which includes:

- *Signature-based Handling of Asserted information using toKENs (SHAKEN)*, an industry framework for managing and deploying Secure Telephone Identity (STI) technologies with the purpose of providing end-to-end cryptographic authentication and verification of the telephone identity and other information in an IP-based service provider voice network.
- *SHAKEN: Governance Model and Certificate Management*, which identifies the key roles/functions involved in distributing and managing SHAKEN certificates.
- *Technical Report on SHAKEN APIs for a Centralized Signing and Signature Validation Server (ATIS-100082)*, which provides a Technical Report on a SHAKEN APIs used to support a Centralized Signing and Signature Validation Server.
- *Technical Report on a Framework for Display of Verified Caller ID (ATIS-100081)*, which provides a framework for signaling verified Caller ID information from the network to a User Equipment (UE) and displaying the information on the UE in a uniform manner, independent of technology.

ATIS is also involved in other initiatives focused on robocall mitigation. The Secure Telephone Identity Governance Authority (STI-GA) operates under the auspices of ATIS. The STI-GA ensures the integrity of the issuance, management, security and use of Secure Telephone Identity (STI) certificates issued in compliance with the SHAKEN standard. ATIS also operates the ATIS Robocalling Testbed, hosted by the Neustar Trust Lab. This testbed validates the effectiveness of SHAKEN as an implementation framework for service providers to better combat robocalls and call spoofing on IP-based networks.

ATIS also recently launched its Robocalling & Communication ID Spoofing (RCID) Group, an initiative of the ATIS Technology and Operations Council. The RCID Group is developing a coordinated landscape view of all robocalling and spamming efforts and considering needs for further standards development, which include:

- The evaluation of known activities/standards;
- The creation of recommendations for further technical standards work in ATIS to provide updated mitigation techniques;
- Coordination of international organizations and input from enterprise/device vendors;
- Consumer education on the current robocalling and spoofing mitigation activities; and
- Evaluation of industry work and legislative/regulatory ecosystem to assess the landscape for interconnectivity, gaps and future paths.

## II. COMMENTS

As noted above, the *Public Notice* seeks comment on the impact of call blocking on 911 services and public safety.<sup>1</sup> ATIS PTSC notes that work is underway within the industry to mitigate impacts to 911 by cryptographically signing the header field to allow a receiving entity to verify that the traffic is authorized 911 public safety traffic.

A new Internet Draft being considered by the Internet Engineering Task Force (IETF) would enable cryptographic signing of 911 emergency call origination and callback. *Assertion Values for a Resource Priority Header Claim in Support of Emergency Services Networks*, (dated January 10, 2020) proposes new assertion values for a “Resource Priority” header (“rph”) claim in support of Emergency Services Networks for emergency call origination and callback.

This work builds upon RFC8443, *Personal Assertion Token (PASSporT) Extension for Resource Priority Authorization* (August 2018), which would allow the inclusion of cryptographically signed assertions of authorization for the values populated in the SIP rph field (used for communications resource prioritization). The new Internet Draft under consideration

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<sup>1</sup> Public Notice at p.3.

proposes a value for the rph field that could be used by the originating party to identify priority traffic and that can be relied on by the receiving party to prioritize communications.

This Internet Draft provides a mechanism for terminating networks to cryptographically verify that emergency services traffic is authorized, but it doesn't specify how the receiving network treats the emergency services traffic. How these rph new assertion values will be used to route real-time communications is outside the scope of this document, and will typically be a matter of local policy.

### **III. CONCLUSION**

ATIS appreciates the opportunity to provide its input to the *Public Notice* and would be happy to provide additional information about the industry work described in these comments.

Respectfully submitted,



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