

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

In the Matter of)
)
Protecting Consumers from SIM Swap) WC Docket No. 21-341
and Port Out Fraud)
)

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

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Notice of Proposed Rulemaking (NPRM)* released September 30, 2021, in the above-referenced docket. In this *NPRM*, the Federal Communications Commission (Commission) seeks comment on measures to address subscriber identity module swapping (SIM swapping and port-out fraud). As the developer of industry standards related to the billing and provisioning of wireless and wireless telecommunications services, ATIS looks forward to the opportunity to evaluate the impacts of any changes that the Commission may approve to its rules on telecommunications ordering, billing, and provisioning.

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 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

II. COMMENTS

In the *NPRM*, the Commission seeks comment on proposals to strengthen its number porting rules to protect customers from unauthorized ports and port-out fraud.¹ The Commission proposes to require wireless carriers to provide notification to customers through text message or other push notification to the customer's device whenever a port-out request is made and to offer customers the option to place a "port-freeze" on their accounts at no cost.² The Commission further proposes to codify the types of information carriers must use to validate simple wireless-to-wireless port requests, and seeks comment on additional fields of customer-provided information it should require for validation of wireless-to-wireless ports to minimize port-out fraud.³ The Commission also asks whether a standard-setting body, such as ATIS, could provide technical expertise to evaluate SIM swap out or port-out fraud.⁴

For 36 years, ATIS' Ordering and Billing Forum (OBF) has been working on issues related to the ordering, billing, and provisioning of telecommunications services, or that impact

¹ *NPRM* at ¶49 *et seq.*

² *NPRM* at ¶50, 57.

³ *NPRM* at ¶¶58-59.

⁴ *NPRM* at ¶72.

the exchange of information relating to interconnection services and other connectivity between telecommunications providers and customers. As part of this work, ATIS OBF develops specifications to enable automated exchange of information needed to support Local, Access, and Wireless service ordering, along with the standards for intercompany billing and record exchange, for IP-based and TDM-based networks.

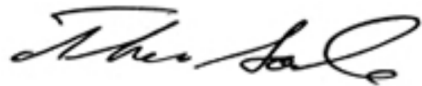
ATIS OBF looks forward to the opportunity to evaluate the impacts of any changes that the Commission may make to its rules on telecommunications ordering, billing, and provisioning. ATIS OBF notes that the changes the Commission is contemplating in the *NPRM* may impact its Wireless Intercarrier Communications Interface Specification (WICIS).⁵ WICIS defines the operational requirements and technical specifications for the exchange of information needed for the Intercarrier Communications Process and specifies the number portability intercarrier communications processes for wireless providers. ATIS OBF stands ready to consider the impacts of any changes to the Commission's rules on the ordering, billing, and/or provisioning of services and to evaluate whether changes to WICIS are warranted.

⁵ See *Unified Ordering Model (UOM), Volume I – Business Requirements, Wireless Intercarrier Communications Interface Specification (WICIS) for Local Number Portability Version 5.0.0*, *Unified Ordering Model (UOM), Volume II – Analysis, Wireless Intercarrier Communications Interface Specification (WICIS) for Local Number Portability Version 5.0.0*; and *Unified Ordering Model (UOM), Volume III – Design, Wireless Intercarrier Communications Interface Specification (WICIS) for Local Number Portability Version 5.0.0* (ATIS-0409001-0500).

III. CONCLUSION

ATIS appreciates the opportunity to provide input to the *NPRM* on behalf of its OBF. ATIS OBF looks forward to the opportunity to evaluate the impacts of any changes that the Commission may make to its rules on telecommunications ordering, billing, and provisioning.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas Goode', written in a cursive style.

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