



## Go-Live Public Report

### Summary

Following a month of testing by both STI-GA representatives and at least one non-STI-GA company, the STI-PA services were declared ready, going live on December 16, 2019.

Since this date, SPs and CAs have begun registering to participate in the ecosystem. The registration process was designed to allow for the proper vetting of SPs seeking to join the ecosystem. As such, it includes a number of steps each registering entity must complete before they are declared "active."

It was expected that there would be a learning curve as all of these processes are new. In practice, it appears SPs are moving through the registration process at different speeds. The STI-GA and the STI-PA have discussed methods to help all providers successfully complete the registration process more quickly while ensuring proper vetting is still occurring. The STI-GA continues to closely monitor the overall registration process but is pleased with the success of the December Go-Live.

### Initial Registration

As of February 25, 2020, a total of 38 SPs had formally initiated the registration process. The registrants include large, medium, and small companies, as well as wireless, wireline, including rural, and interconnected VoIP providers. The STI-PA also responded to inquiries from SPs that have not yet registered but had questions about the process.

The SP registration process consists of the provision of information needed by the STI-PA to properly vet the SP to ensure they meet the SPC token Access Policy.<sup>1</sup> In order to complete the registration process each SP must provide the STI-PA with a valid OCN, proof that they have a 499A on file with the FCC,<sup>2</sup> and proof of direct access to telephone numbers. Once this information has been provided, the SP may begin the staging process during which they must complete a battery of tests to exhibit their own understanding of and systems readiness for proper communications with the STI-PA. The staging process is designed to ensure technical wrinkles get ironed out prior to the SP fully joining the SHAKEN ecosystem and attempting to communicate within that ecosystem with not only the STI-PA, but also STI-CAs and other SPs.

CAs must also register and, as part of this process, submit a CPS that details how they will comply with the STI-GA approved Certificate Policy (CP). As of February 25, a total of 12 CAs had formally initiated the registration process, with four (4) having completed the registration. Of these, two (2) will provide certificates to any eligible SP and two (2) will serve only their own company's certificate needs.

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<sup>1</sup> <https://www.atis.org/sti-ga/resources/docs/SPC%20Token%20Access%20Policy.pdf>

<sup>2</sup> Actual 499A revenue data is provided after the signing of the Service Provider Agreement, which protects the confidentiality of this data.

## **Lessons learned (so far)**

The registration process is meant to filter out SPs that either do not qualify or are not fully technically prepared to enter the SHAKEN ecosystem. For most SPs, it takes time to aggregate the data from their 499A filings. Thus far, only two SPs have expressed concern with providing the data at all, each asking the STI-PA to sign a company-specific non-disclosure agreement. These concerns have been appropriately addressed by the STI-GA Board and the STI-PA via changes to the SP agreement. The Technical Committee (TC) has asked the STI-PA to address various documentation and minor software issues<sup>3</sup> to ensure a smooth registration process. The STI-PA has addressed or is in the process of addressing those issues.

One step that has already been taken by the TC and the STI-PA that may speed registration is the provision of test accounts to vendors allowing them to assist with walking their SP customers through the registration process. The TC recommended that the STI-PA work with vendors to facilitate SP registration.

## **Funding**

The STI-GA Board agreed to a funding methodology and has shared a funding narrative with the STI-PA so that it may be shared with registering SPs. In this manner SPs may determine the level of their payment before registering. The STI-GA has also posted a new STI-GA Policy document which includes this funding narrative on its STI-GA website (<https://www.atis.org/sti-ga/resources/>).

Invoices for other SPs are issued once an SP completes the click-through SP agreement following completion of the staging process. This is designed to be the final step of the registration process once all vetting is complete.

## **Conclusion**

Go-live has been a success. The STI-PA systems have successfully been made operational. While technical challenges and opportunities for improvement remain, the ecosystem can and does fulfill the role envisioned by the industry and FCC. The STI-GA Board and its Technical Committee have successfully identified and addressed technical and operational issues quickly and appropriately, demonstrating the ability of the industry to manage this important function. As the manager of the ecosystem, the STI-GA must continue to closely monitor STI-PA registrations and act where needed to ensure SPs are able to join the ecosystem. The STI-GA must also provide active oversight to ensure the ecosystem runs as is expected and accomplishes what it was designed to do, help mitigate illegal and unwanted robocalling traffic.

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<sup>3</sup> One example of a documentation issue is that the list of tests for SPs to complete in staging included tests that were only relevant to those companies seeking to become STI-CAs.