

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054**

In the Matter of:]	
]	
Call Authentication Trust Anchor]	WC Docket No. 17-97
]	
Implementation of TRACED Act Section 6(a) –]	WC Docket No. 20-67
Knowledge of Customers by Entities with Access to]	
Numbering Resources]	

COMMENTS

The Voice on the Net Coalition (“VON”)¹ respectfully files these comments in response to the Commission’s Further Notice of Proposed Rulemaking (“FNPRM”) seeking comments on the proposed rules to implement the TRACED Act and further necessary actions to promote caller ID authentication through the STIR/SHAKEN framework.² VON has actively engaged in industry efforts to eliminate illegal robocalls, including through its participation on the STI-GA Board, and generally supports the Commission’s efforts taken in the FNPRM’s companion Report and Order.

CALL AUTHENTICATION. The Commission appropriately sought comment on the ability of voice service providers to authenticate the caller when terminating calls.³ VON supports the

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP-enabled communications, including interconnected Voice over Internet Protocol (“VoIP”). For more information, see www.von.org.

² *Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 and WC Docket No. 20-67 (rel. March 31, 2020); *see also* 85 FR 22,099 (April 21, 2020), establishing the May 15, 2020 deadline for comments.

³ *FNPRM* at ¶¶ 62-64.

Commission’s decision not to extend the STIR/SHAKEN mandate to non-IP networks,⁴ as well as the Commission’s continued efforts to spur greater IP interconnection among voice service providers.⁵ In light of the technical difficulties associated with retrofitting TDM technology to the STIR/SHAKEN infrastructure, VON welcomes the Commission’s encouragement of wide-scale implementation of IP interconnection among voice service providers. In the meantime, VON also supports the continued industry efforts to explore the development of a non-IP call authentication framework where it is not possible to implement IP interconnection.

Further, non-US originated calls, including those lacking a traditional, NANPA-associated phone number, may not contain the necessary information to provide full attestation (i.e., “A” attestation). Many VON members provide voice services outside the United States, including to enterprises based in other countries, and to their U.S.-based customers that may be travelling abroad. Without full attestation, some VON members are concerned that calls may be falsely identified as robocalls and end users will avoid answering otherwise legitimate calls. VON supports a requirement, when feasible, to allow intermediate and/or gateway providers to implement STIR/SHAKEN as one option for identifying calls that originate from abroad and to identify which provider served as the entry point for these calls to U.S. networks.⁶

VON also agrees with the Commission that “out-of-band” STIR/SHAKEN is not sufficiently developed for wide-spread implementation.⁷ At this time, non-IP based

⁴ FNPRM at ¶ 38.

⁵ FNPRM at ¶ 85. See also *Chairman Pai Calls On Industry To Adopt Anti-Spoofing Protocols To Help Consumers Combat Scam Robocalls*, Public Notice (Nov. 5, 2018).

⁶ FNPRM at ¶ 64.

⁷ FNPRM at ¶ 65.

intermediate providers remain unable to pass through the Identity Header required for caller ID authentication to be received and verified by terminating voice service providers. Without an ability to receive an Identity Header, or some verifiable surrogate for the Identity Header, voice service providers will remain unable to verify this subset of calls. The Commission should encourage ATIS to develop a generally accepted standard for out-of-band STIR/SHAKEN. This will lead to wider-spread deployment of call authentication technology and a reduction of illegal robocalls.

CALL LABELING. In the STIR/SHAKEN platform, some VON members are concerned that those calls that cannot be fully attested may be labeled differently when the call is terminated. In particular, the correct level of attestation depends on (i) the originating telephone service provider to verify the call source, and (ii) that information being correctly relayed to the terminating service provider. Thus, whether or not the end user is adequately and correctly informed that the call is fully attested is completely dependent upon this information being received by the terminating service provider and its analytics providers.⁸

VON does not support rules that would implement a one-size-fits-all labeling regime to be imposed on terminating voice service providers. The adoption of a uniform labeling regime would stifle innovation and competition among service providers and would stunt the growth of new and developing technologies. Moreover, as the FNPRM notes, the Commission's authority to take such action is unclear.⁹

⁸ FNPRM at ¶121.

⁹ *Id.*

However, VON agrees with the Commission that disparate call labelling policies could result in consumer confusion or could raise allegations of anticompetitive conduct.¹⁰ To that end, VON supports implementation of a mechanism that would provide effective redress obligations so that callers or their service providers could undo calls that have been found to be mislabeled or wrongfully blocked; preferably within 24 hours following notice and determination.¹¹

ACCESS TO NUMBER RESOURCES. In addition to the STIR/SHAKEN issues discussed above, the FNPRM also sought comment on whether the Commission should adopt new rules to limit access to numbering resources in order to reduce illegal robocalls.¹² In the experience of VON and its members, limiting access to telephone numbers would not be an effective means to limit illegal robocalls.

Fundamentally, a phone number is not required to initiate a phone call and obtaining a number through available numbering resources actually provides an opportunity for robocalls to be tracked back to the originating caller. As such, most robocallers either attempt to illegally spoof a preexisting number or initiate a numberless call. Under either scenario, though, access to the numbering resources are not required.

Thus, the proposals contained in the FNPRM would impose additional burdens on legitimate service providers without reducing illegal robocalls.¹³ Rather than expend its limited

¹⁰ *Id.*

¹¹ *Id.* Blocked or mislabeled calls can harm a business's brand and, in this fragile economy, diminish the company's ability to operate.

¹² *FNPRM* at ¶ 127.

¹³ *FNPRM* at ¶ 128.

resources on adopting additional regulations to restrict such access, VON urges the Commission focus its efforts on further supporting the adoption of IP interconnection and thus ensuring that STIR/SHAKEN framework or similar authentication framework are widely implemented by voice service providers.

CONCLUSION

The Commission should act in accordance with the recommendations herein.

Respectfully submitted,

VOICE ON THE NET COALITION

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