

Pillsbury Winthrop Shaw Pittman LLP 1200 Seventeenth Street, NW | Washington, DC 20036 | tel 202.663.8000 | fax 202.663.8007

> Glenn S. Richards tel 202.663.8215 glenn.richards@pillsburylaw.com

July 29, 2021

## VIA ECFS

Marlene H. Dortch, Esq. Secretary Federal Communications Commission 45 L Street NE Washington, DC 20554

## Re: <u>WC Docket No. 17-97</u> - Call Authentication Trust Anchor

Dear Ms. Dortch:

The Voice on the Net Coalition (VON) provides this recommendation in response to the Draft Report and Order (Draft) released July 15, 2021, in the above-referenced docket.

In Paragraph 17 of the Draft, the Commission rejected the VON proposal to establish a time limit for the Commission to complete its review of Governance Authority decisions to revoke a service provider token. Though VON continues to assert that time limits are necessary since revocation could substantially negatively impact a service provider's business, if the Commission chooses not to impose a time limit, VON recommends that the Commission not consider the revocation final, and thus not take any enforcement action against the service provider (or any of its delegated certificate customers) for noncompliance with STIR/SHAKEN obligations during the pendency of the appeal. Without such policy, a service provider could be subject to a federal government enforcement action as the result of the decision by a private party (Governance Authority) without an effective and timely right to appeal.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

By: /s/ Glenn S. Richards