

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Caller ID Authentication Progress) WC Docket No. 20-323
)

COMMENTS OF INCOMPAS

INCOMPAS, by its undersigned counsel, hereby submits these comments in response to the Federal Communications Commission’s (“Commission” or “FCC”) *Public Notice* seeking comment for a report to Congress on the extent to which voice service providers have implemented caller ID authentication frameworks in IP and non-IP portions of their networks and the impact of such implementation.¹

Over the last two years, voice service providers have rallied together, with the guidance and assistance of Congress² and the Commission, to implement caller ID authentication frameworks in an attempt to mitigate and protect consumers from the threat of illegal spoofing. Since establishing the Secure Telephone Identity – Governance Authority, industry has made consistent progress towards implementation and adoption of the STIR/SHAKEN framework in IP portions of voice service providers’ networks, and the Commission’s subsequent call

¹ See *Wireline Competition Bureau Invites Comment on Caller ID Authentication Progress for Report to Congress*, WC Docket No. 20-323, Public Notice, DA 20-1153 (rel. Oct. 1, 2020) (“*Public Notice*”).

² Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019) (“TRACED Act”).

authentication mandates on originating, terminating,³ and intermediate providers⁴ ensure that major voice service providers will be exchanging voice traffic using the framework by the middle of 2021. Competitive voice service providers have been active participants in the development of the STIR/SHAKEN framework and have worked alongside other industry stakeholders to ensure that the framework is implemented in a competitively neutral and non-discriminatory manner. Competitive providers typically enter the market using a variety of service models and innovative technologies, and the STI-GA deserves praise for continuing to examine issues related to competitive providers' participation in the STIR/SHAKEN framework.

Despite this progress, considerable work remains to ensure that all voice service providers can take advantage of robust caller ID authentication frameworks in both the IP and non-IP portions of their networks, and INCOMPAS urges the Commission to play an active role in making sure that industry is “addressing all aspects of call authentication.” The Commission identified many of these challenges in the recently released *Second Caller ID Authentication Report and Order*. For example, industry continues to work towards a viable solution to implement an effective caller ID authentication framework in the non-IP portions of voice service providers' networks. Additionally, certificate access remains a critical, unresolved issue, as some providers cannot obtain a certificate for intercarrier exchange of authenticated caller ID information due to an inability to meet the prerequisites of the Governance Authority's current token access policy. The indefinite extension the Commission granted to voice service providers

³ See *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241 (rel. Mar. 31, 2020) (“*First Caller ID Authentication Report and Order and Further Notice*”).

⁴ See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, FCC 20-136 (rel. Oct. 1, 2020) (“*Second Caller ID Authentication Report and Order*”) (extending the STIR/SHAKEN implementation mandate to intermediate providers).

that are unable to obtain a certificate is a warranted first step and INCOMPAS encourages the Commission to closely monitor this situation to make sure it is resolved in a manner that permits all voice service providers to participate in STIR/SHAKEN.

Additionally, the Commission recognized “the outstanding challenges for complex enterprise uses cases and business models” that persist under the current framework and encouraged the industry “to promptly resolve” these issues. INCOMPAS has championed certificate delegation as a potential solution to these challenges. INCOMPAS members view effective delegation of certificate authority as a means to enhance the application of STIR/SHAKEN and provide their customers with an opportunity to sign calls for a wide range of use case scenarios where valid and successful service models may utilize numbers from third-parties or multiple underlying carriers. Developing protocols for certificate delegation will support consumer demands for a wide range of technologically advanced use cases, beyond enterprise calls, and provide for a more robust use of call authentication in the marketplace. While the Commission determined that it was unnecessary to require standards for certificate delegation and other enterprise call solutions at this time, INCOMPAS recommends that the Commission reconsider this position if industry is unable to meet the agency’s expectation that enterprise calling challenges are quickly resolved.⁵

Finally, both USTelecom and CTIA, representing incumbent telcos and wireless carriers, respectively, raised concerns about “unforeseen technical issues” related to the Commission’s proposal to require foreign voice service providers to institute and certify implementation of

⁵ See *Second Caller ID Authentication Report and Order* at para. 59 (“As industry stakeholders, standards bodies, and the Governance Authority are actively working to finalize standards and solutions to complex enterprise calling cases, we do not wish to intervene in the process. At the same time, we continue to encourage—and expect—industry to promptly resolve the outstanding challenges. . . .”) (emphasis added).

robocall mitigation programs to ensure that domestic intermediate and terminating voice service providers accept the foreign providers' traffic. INCOMPAS represents foreign voice service providers that share these concerns, including that the Commission's action could result in the blocking of legitimate calls. While INCOMPAS intends to engage with industry on how to resolve these concerns, it could represent a significant barrier to foreign voice service providers if technical solutions cannot be developed by next year's STIR/SHAKEN compliance deadline.

These challenges must be resolved before the Commission can be assured that current caller ID authentication frameworks are "addressing all aspects of call authentication."

INCOMPAS urges the Commission to consider these issues as it reports to Congress on the implementation of caller ID authentication.

Respectfully submitted,

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