

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

In the Matter of	)	
	)	
Wireline Competition Bureau Invites	)	WC Docket No. 20-324
Comment on Caller ID Authentication	)	
Best Practices	)	

**REPLY COMMENTS OF INCOMPAS**

INCOMPAS, by its undersigned counsel, hereby submits these reply comments in response to the Federal Communications Commission’s (“Commission” or “FCC”) *Public Notice* seeking comment on the North American Numbering Council’s (“NANC”) Call Authentication Trust Anchor (“CATA”) Working Group report on “Best Practices for the Implementation of Call Authentication Frameworks” (“Report”).<sup>1</sup>

The TRACED Act instructs the Commission to “issue best practices that providers of voice service may use as part of the implementation of effective call authentication frameworks . . . to take steps to ensure the calling party is accurately identified.”<sup>2</sup> As part of the CATA Working Group tasked with developing these recommendations, INCOMPAS and several of its members can attest to the report’s assertion that the best practices were developed in good faith “through rigorous deliberation and industry consensus by a broad set of stakeholders.”<sup>3</sup>

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<sup>1</sup> See *Wireline Competition Bureau Invites Comment on Caller ID Authentication Best Practices*, WC Docket No. 20-324, Public Notice, DA 20-1154 (rel. Oct. 1, 2020) (“*Public Notice*”).

<sup>2</sup> Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274, at § 4(b)(7) (2019) (“TRACED Act”).

<sup>3</sup> Call Authentication Trust Anchor Working Grp., N. Am. Numbering Council, Best Practices for the Implementation of Call Authentication Frameworks, 4 (2020), *available at* <http://nanc-chair.org/docs/CATAWGReport-August2020Draft.pdf> (“CATA Report”).

INCOMPAS urges the Commission to issue these voluntary best practices and encourage voice service providers to implement selected best practices from the CATA Report to assist in the overall mitigation of robocalls.

The CATA Report identifies best practices in the areas of (1) subscriber vetting; (2) telephone number validation; (3) STIR/SHAKEN attestation; (4) third-party validation services; (5) identifying international subscribers; and (6) ongoing robocall mitigation techniques.<sup>4</sup>

INCOMPAS is generally supportive of these recommendations, as many of our members are engaging in these call identification and authentication activities already, but would note that an important feature of the report is the CATA Working Group's stated intention that the best practices "are considered voluntary and do not imply mandatory implementation, nor should they be mandated."<sup>5</sup> The CATA Working Group was deliberate in its efforts to craft best practices that give voice service providers the flexibility to implement solutions that meet the needs of their networks and technology.

As INCOMPAS discussed in its comments related to the Commission's upcoming progress report to Congress on the implementation of caller ID authentication frameworks, despite the extensive progress that has been achieved by industry and the Secure Telephone Identity Governance Authority, there are still considerable challenges that must be addressed 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.<sup>6</sup> Several stakeholders have

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<sup>4</sup> See *Public Notice* at 1.

<sup>5</sup> CATA Report at 4.

<sup>6</sup> See Comments of INCOMPAS, WC Docket No. 20-323, at 2 (filed Oct. 16, 2020) (highlighting challenges such as the lack of an industry standard for call authentication in the non-IP portions

raised concerns that the best practices in the CATA Report may not adequately address ongoing concerns from competitive providers about achieving proper attestation through STIR/SHAKEN<sup>7</sup> or solving for enterprise use cases.<sup>8</sup> INCOMPAS has championed certificate delegation as a potential solution to “the outstanding challenges for complex enterprise use cases and business models.”<sup>9</sup> INCOMPAS members are actively pursuing methods to enhance the application of STIR/SHAKEN that can provide their customers with confidence that their valid calls for a wide range of use case scenarios and service models that may utilize numbers from third-parties or multiple underlying carriers work. Developing protocols for certificate delegation will support consumer demands for a wide range of technologically advanced use cases, beyond enterprise calls, and promises to provide better and more robust use of call authentication in the marketplace ultimately. 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

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of voice service providers’ networks, access to certificates, certificate delegation as a solution for enterprise use cases, and technical issues related to foreign service providers’ certification of robocall mitigation programs).

<sup>7</sup> See Comments of Inteliquent, Inc., WC Docket No. 20-324, at 2, 4 (filed Oct. 16, 2020) (explaining that the CATA Report’s suggestion to allow full attestation only when an originating service provider can attest that an end-user is authorized to use a TN-based caller identity directly linked to a calling line or account is “a more narrow scenario than anticipated by the ATIS standards” and “may needlessly limit the ability to enable full attestation, which is detrimental to a variety of legitimate calls,” including enterprise calling).

<sup>8</sup> See Comments of Professional Association for Customer Engagement, WC Docket No. 20-324, at 2 (filed Oct. 16 2020).

<sup>9</sup> See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, FCC 20-136, para. 59 (rel. Oct. 1, 2020).

unable to meet the agency’s expectation that enterprise calling challenges should be quickly resolved.<sup>10</sup>

As industry continues to identify and standardize solutions to these challenges, the CATA Working Group’s recommendations should be employed as needed to enhance a voice service provider’s ability to eliminate illegal spoofed calls. Flexibility in the application of these best practices should allow voice service providers to address these ongoing concerns in a manner consistent with current call authentication standards and providers’ needs. As such, INCOMPAS urges the Commission to refrain from using the report to adopt an overly prescriptive approach that might hinder the deployment of new, innovative network platforms or technologies or that otherwise burden such voice service providers that are taking adequate steps to eliminate illegal robocalls on their networks.

INCOMPAS commends the Commission and the North American Numbering Council for the progress it has made with the *CATA Working Group Report* to achieve the goals and objectives of the TRACED Act and to protect consumers from illegal robocalls. INCOMPAS members are fully committed to working with the Commission to eliminate this threat. INCOMPAS therefore urges the Commission to adopt and issue these best practices in order to promote and ensure further implementation of caller ID authentication solutions.

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<sup>10</sup> *See id.* (“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).

Respectfully submitted,

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