

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Methods to Target and Eliminate Unlawful Robocalls)	CG Docket No. 17-59
)	
Petition for Reconsideration and Request for Clarification of USTelecom— The Broadband Association)	

**JOINT COMMENTS OF INCOMPAS AND
THE CLOUD COMMUNICATIONS ALLIANCE**

INCOMPAS and the Cloud Communications Alliance (“CCA”) submit these joint comments in response to the Federal Communications Commission’s (“Commission”) *Sixth Further Notice of Proposed Rulemaking* on the retention of the requirement that voice service providers use only SIP Codes 607 and 608 for call blocking and transition from the use of SIP Code 603 for immediate call blocking notification.¹

As the Commission has explored call blocking as a solution to mitigating the threat of illegal robocalls, our associations have urged the Commission to adopt call blocking measures incrementally in a manner that recognizes the complex environment in which blocking is conducted and discourages the possibility for discriminatory treatment of calls from competitive voice service providers. Over the course of these various proceedings, INCOMPAS and CCA have advocated for a robust and uniform system of notification and redress so that callers and

¹ *Advanced Methods to Target and Eliminate Unlawful Robocalls, Petition for Reconsideration and Request for Clarification of USTelecom—The Broadband Association, Order on Reconsideration, Sixth Further Notice of Proposed Rulemaking, and Waiver Order, CG Docket No. 17-59, FCC 21-126 (rel. Dec. 14, 2021)* (“*Further Notice*”).

voice service providers can respond to and correct call blocking in the event of false positives. An effective notification and redress system that requires the use of SIP Codes 607 and 608 for notification should be viewed as the linchpin to the Commission's efforts to successfully mitigate illegal robocalls through call blocking. Such a system would encourage industry cooperation to address erroneous blocking, lead to innovation that will correct ongoing problems, and provide an avenue to help address disputes that may not otherwise be easily resolved between providers. While concerns about overblocking may not immediately abate, providing competitive voice service providers with adequate information via immediate automated notifications to enable effective redress on behalf of their customers for either erroneously or intentionally blocked calls is critical to the Commission's goals of restoring trust in the voice service networks. Consumers are the ultimate beneficiaries of an effective notification process as it helps ensure that critical communications reach their intended audience while illegal traffic is identified and mitigated.

To that end, INCOMPAS and CCA urge the Federal Communications Commission ("Commission") to retain SIP Codes 607 and 608 as the ultimate form of immediate notification, seek input from standards-setting bodies on a reasonable deadline for implementation, and to request that industry submit periodic progress reports on the finalization of these standards. The Commission should transition away from the use of SIP Code 603 concurrently with the implementation of operational standards for SIP Codes 607 and 608.

I. THE COMMISSION SHOULD CONFIRM THAT SIP CODES 607 AND 608 WILL ULTIMATELY BE REQUIRED AND DIRECT INDUSTRY TO COMPLETE STANDARDS AND REPORT ON PROGRESS

The Commission's belief that "voice service providers ultimately use only SIP Codes 607 and 608" as they "present the best long-term solution for immediate notification" is fully

warranted.² We strongly support the Commission’s suggestion that it “encourage standards-setting bodies to finalize their work” on implementation standards.³ As the Commission acknowledges, SIP Codes 607 and 608 were promulgated specifically to address robocall blocking and are designed to provide the actionable information that callers and their service providers need to trigger redress options.

The Commission should reaffirm that use of SIP Code 603 is a purely short term, interim measure while ATIS finalizes the necessary standards to operationalize SIP Codes 607 and 608. The primary complaint lodged against SIP Codes 607 and 608 was that the Commission mandated their use before ATIS had approved operational standards, yet throughout the year that the Commission initially provided for implementation, it does not appear much if any progress was made in developing necessary standards.⁴

As an initial step toward implementation of SIP Codes 607 and 608, the Commission should determine the current status of the standards development process. Pursuant to ATIS operating procedures, an initial step is to develop a projected timeline when an issue is submitted

² *Further Notice* at para. 43.

³ *Id.*

⁴ The SIP Forum website reveals the submission in early 2021 of a draft technical report that was to provide an analysis of SIP Codes 607 and 608 and their use in voice service provider networks that went through four very similar iterations. *See* Analysis of Support of RFC 8197 (Unwanted) and RFC 8688 (Rejected) in VoIP Networks, (IPNNI-2021-00027R00-R003) *available at* [ATIS: IPNNI-2021-00027R003.docx](#). The last draft concluded that the jcard should be optional and that the IPNNI should work with the Commission on a series of open questions raised in the document. A joint contribution by Google, Microsoft, Telynx and Twilio addressed a number of the questions posed in the earlier document and made suggestions for addressing certain use cases. This document is available at IPNNI-2021-00052R000, [IPNNI-2021-00052R000.docx \(live.com\)](#). It appears no further action occurred after mid-2021.

for resolution.⁵ ATIS’ operating procedures then outline the steps from submission of the issue through resolution, including requests for “expedited handling.”⁶ The Commission should determine whether the development of a standard for SIP Codes 607 and 608 has been submitted, and, if so, its specific “status.”⁷ If the development of an ATIS standard for SIP Codes 607 and 608 has not been submitted, the Commission should encourage the industry to promptly submit this issue and advise the Commission of the projected timeline. The information should inform the establishment of a firm deadline to finalize the standards and require use of SIP Codes 607 and 608.

To ensure work is ongoing, the Commission should require periodic reports, either monthly or at least every other month, of ATIS’s progress toward finalizing the standard. ATIS’ procedures already require some publication of activities, including publication in a “timely manner” of detailed meeting notes.⁸ It is critical that the Commission send an unequivocal message to those segments of the industry that continue to resist implementation of SIP Codes 607 and 608 that they must work cooperatively within the ATIS standards setting process to

⁵ Operating Procedures for ATIS Forums and Committees, Version 5.6, Nov. 16, 2020 § 5, Issues (“ATIS Operating Procedures”). (“An Issue is the means by which work is progressed in the ATIS Forums, and any Subcommittee or Task Force. An Issue may be thought of as similar to a project proposal, where the problem/Issue and proposed resolution (if provided) are defined, and a suggested timeline for completing the Issue resolution is developed. Work corresponding to Issue resolution is tracked via the Issue process defined below.”)

⁶ ATIS Operating Procedures at § 5.1

⁷ It is not clear whether the documents referenced in n. 4 constituted a submission under ATIS’s operating procedures. Those operating procedures identify a number of status categories. *See* ATIS Operating Procedures at § 5.3 Working an Issue. A standard for implementation of SIP Codes 607 and 608 presumably would constitute an American National Standard (ANS). Further operating procedures for developing an ANS are included in Appendix A of the ATIS Operating Procedures.

⁸ ATIS Operating Procedures at § 9.

finalize the standards as expeditiously as possible. The Commission should be prepared to intervene if industry consensus cannot be achieved.

II. THE COMMISSION SHOULD REJECT EFFORTS TO USE SIP CODE 603 AS A PERMANENT NOTIFICATION SOLUTION

We anticipate some providers may seek to marginalize SIP Codes 607 and 608 and make SIP Code 603 the ultimate notification standard. As was previously explained, however, substantial revisions would be required to convert SIP Code 603 into an actionable blocking notification mechanism.⁹ As our organizations and the Voice on the Net Coalition (“VON Coalition”) recently asserted:

SIP response code 603 is likely to be largely unusable by providers because it does not provide actionable information, and it is not designed to help you understand why a call is blocked. That lack of information means that the 603 response code does not inform the originating provider that there might be a robocaller using their platform, so it is less useful in combating unlawful robocalls than the 607 or 608 response codes. In addition, a 603 response code does not identify the sender of the code, undermining its utility in resolving the blocking of legitimate calls.¹⁰

While our organizations understand that permitting the use of SIP Code 603 is a temporary means of addressing call blocking and notification while industry worked to complete the standardization process for these response codes, we do support and urge the Commission in ultimately transitioning away from 603 for immediate notification purposes. Time and effort would be better spent finalizing the standards for SIP Codes 607 and 608. Failure to do so could

⁹ See Ex Parte Letter of INCOMPAS, CG Docket No. 17-59 (filed Oct. 12, 2021), at 3. During the meeting, representatives from INCOMPAS and CCA indicated that “[i]n order to have true operational value, SIP Code 603 would need to be redefined in the IETF standards as a network-level or analytics-based blocking code, a result which is unlikely at this time.”

¹⁰ See Joint Ex Parte Letter of VON Coalition, INCOMPAS, and CCA, CG Docket No. 17-59 (filed Dec. 9, 2021) at 1-2.

complicate efforts to combat unwanted and illegal robocalls while also maintaining the reliability of the voice network.

As an example, since the Commission's reconsideration of its immediate call blocking notification rules in December, terminating voice service providers that are sending SIP Code 603 in response to blocked calls have been frustrated by the number of automatic retries that are being resent by originating and intermediate providers. When one of these providers currently receives a 603 notification—since there is not enough standardized information readily available for the provider to determine that a call has been blocked based on any analytical concern over illegal robocalls—typical network architectures dictate that the rejected call be retried along a different path. Then, the next set of terminating providers may also determine the retried call is an illegal robocall send another 603 response back to the originating and intermediate provider, who again are not readily able to determine why a call was blocked. This interconnected system of carriers that are exchanging SIP Code 603s and subsequently re-trying the calls creates high volume call cycles that consume dramatically more network capacity than is generally warranted. All providers in the call path now face problems associated with the use of 603—originating and intermediate providers have little knowledge about why calls are being blocked or who is doing the blocking, and terminating providers are forced to continue to block calls after automatic retries.

While the industry as a whole may not have foreseen the turmoil that the interim use of SIP Code 603 would cause, it is reasonably easy to see the benefits of moving to a system that exclusively uses response codes designed for blocking illegal robocalls. The use of codes 607 and 608, rather than 603, in the long term is the appropriate solution to this problem.

III. CONCLUSION

With the concern addressed that terminating providers will have no way to provide immediate notification of call blocking with the addition of 603, industry must now turn its attention to making sure that, in the long term, networks work efficiently for all providers and the blocking of legitimate calls can be quickly resolved. We urge the Commission to set in place the necessary steps to ensure that SIP Codes 607 and 608 are not only standardized, but adopted and implemented by industry. We further urge the Commission to transition from SIP Code 603 concurrently with the implementation of operational standards for SIP Codes 607 and 608.

Respectfully submitted,

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