

**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
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97

**REPLY COMMENTS OF INCOMPAS**

INCOMPAS submits these reply comments in response to the Federal Communications Commission’s (“Commission”) *Public Notice* in WC Docket No. 17-97 seeking comment on the Commission’s annual reevaluation of the STIR/SHAKEN implementation extensions for certain subsets of providers and on the efficacy of the STIR/SHAKEN call authentication framework as a tool for mitigating illegal robocalls.<sup>1</sup>

INCOMPAS remains an active participant in the work of the STI-GA and is committed to continuing the development and implementation of the STIR/SHAKEN framework. Over the last year, the STI-GA has continued to refine the policies and functionality of the STIR/SHAKEN framework and this broadened applicability has allowed new service providers, Resp Orgs, and industry vendors to participate in the framework.<sup>2</sup> Based on this progress, INCOMPAS submits that STIR/SHAKEN, where implemented, is effectuating the

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<sup>1</sup> *Wireline Competition Bureau Seeks Comment on Two Periodic TRACED Act Obligations Regarding Caller ID Authentication*, Public Notice, WC Docket No. 17-97, DA 22-831 (rel. Aug. 5, 2022) (“*Public Notice*”).

<sup>2</sup> See Press Release, STI-GA, STI-GA Enhances STIR/SHAKEN Functionality to Authenticate Broader Range of Calls (Oct. 20, 2021), available at <https://www.atis.org/press-releases/sti-ga-enhances-stir-shaken-functionality-to-authenticate-broader-range-of-calls/>.

authentication of caller ID information as intended. INCOMPAS remains encouraged that the framework, when fully deployed, will serve as a critical component of the Commission's and industry's efforts to mitigate illegal robocalls and prevent customers from being victimized by illegal spoofing.

That said, for the following reasons, INCOMPAS believes it is still premature to evaluate the efficacy of the framework in practice. First, as noted in the *Public Notice*, small voice service providers and voice service providers that cannot obtain a SPC token are still subject to extensions to implement STIR/SHAKEN.<sup>3</sup> The expiration of that extension for small voice service providers in 2023 will mark an important milestone for the framework and as more providers complete implementation or avail themselves of the new SPC token access policy by the STI-GA, industry and the Commission should get a better sense of the role the framework is playing in illegal robocall mitigation efforts. Second, the STIR/SHAKEN standards were developed with limited consideration for the wholesale service and enterprise voice service models, leaving gaps in the framework that industry has made a good faith effort to address through market-based solutions. Until the Commission and industry reach consensus on issues like token access and third party authentication,<sup>4</sup> it will remain difficult to gauge the framework's effectiveness.

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<sup>3</sup> *Public Notice* at 2-5.

<sup>4</sup> See *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, Sixth Report and Order in CG Docket No. 17-59, Fifth Report and Order in WC Docket No. 17-97, Order, Seventh Further Notice of Proposed Rulemaking in CG Docket No. 17-59, and Fifth Further Notice of Proposed Rulemaking in WC Docket No. 17-97, FCC 22-37 (rel. May 20, 2022) (seeking comment on, *inter alia*, third party authentication and clarifying the Commission's rules for providers that lack control of the necessary infrastructure to implement STIR/SHAKEN).

Finally, as noted by other stakeholders in response to the *Public Notice*, one of the greatest challenges to implementing the STIR/SHAKEN framework across the nation’s voice service networks is the lack of IP interconnection.<sup>5</sup> Many competitive voice service providers continue to face obstacles in reaching IP interconnection agreements with industry partners. To that end, the Commission should focus on setting expectations that voice service providers will engage in IP interconnection negotiations for the purpose of achieving end-to-end caller ID authentication. Until industry settles on readily available solutions to this long-standing IP interconnection hurdle or the Commission adopts interconnection requirements, the effectiveness of the STIR/SHAKEN framework will be muted.<sup>6</sup>

INCOMPAS further submits that the Commission should reject any proposal to consider an alternative to the framework. STIR/SHAKEN remains a promising and important tool in the fight to further mitigate illegal robocalls, and while it may be premature to fully evaluate the success of the framework, it is representative of how industry can modulate and address illegal robocalling in a standardized way.

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<sup>5</sup> See, e.g., Comments of the Voice on the Net Coalition, WC Docket No. 17-97, 2-3 (filed Oct. 3, 2022) (arguing that the unavailability of IP interconnection could be an impediment to end-to-end STIR/SHAKEN); Comments of NCTA—The Internet & Television Association, WC Docket No. 17-97, 1 (filed Oct. 3, 2022) (indicating that the adoption of STIR/SHAKEN has been hindered by carriers that have not transitioned to IP); Ex Parte Notice of NTCA—The Rural Broadband Association, WC Docket No. 17-97, 1 (filed Oct. 3, 2022) (highlighting the “interplay between IP interconnection, a broader transition to IP technologies, and call authentication objectives”).

<sup>6</sup> See CALL AUTHENTICATION TRUST ANCHOR WORKING GROUP, NORTH AMERICAN NUMBERING COUNCIL, FCC, DEPLOYMENT OF STIR/SHAKEN BY SMALL VOICE SERVICE PROVIDERS (2021), available at [https://nanc-chair.org/docs/October\\_13\\_2021\\_CATA\\_Working\\_Group\\_Report\\_to\\_NANC.pdf](https://nanc-chair.org/docs/October_13_2021_CATA_Working_Group_Report_to_NANC.pdf) (recommending that the Commission permit industry to develop and propose a solution to the SIP interconnection problem within 6-12 months of the date of the report).

Respectfully submitted,

**INCOMPAS**

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