

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

In the Matter of:)

Call Authentication Trust Anchor)

WC Docket No. 17-97)

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net Coalition (“VON”)¹ respectfully files these comments in response to the Commission’s Notice of Inquiry (“NOI”) in the above-captioned proceeding.² VON supports the Commission’s efforts to eliminate illegal robocalls. It also generally supports the efforts of stakeholders to develop the SHAKEN/STIR model. However, these efforts need to be balanced with the practicalities of the marketplace, the recognition that no single solution will stop all illegal robocalls, and the reality that the bad actors can easily react to avoid detection once solutions have been implemented. As such, VON cautions that: (1) the model remain under development, as testing and implementation has only recently commenced; (2) industry should retain primary responsibility for implementation but the Commission should maintain oversight to resolve any issues that may arise concerning competitive neutrality among voice service providers and technologies; and (3) issues related to cost recovery should be addressed.

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP enabled communications. VON Coalition members are developing and delivering voice and other communications applications that may be used over the Internet. For more information, see www.von.org.

² *Call Authentication Trust Anchor*, Notice of Inquiry, WC Docket No. 17-97, FCC 17-89 (rel. Jul. 14, 2017) (“NOI”).

I. The SHAKEN/STIR model remains under development as implementation commences.

As an initial matter, VON believes that the SHAKEN/STIR model holds promise, but important work remains as testing and implementation have only just begun. Indeed, there are still outstanding questions about whether either of the frameworks and standards will work equally well with VoIP calls and traditional wireline calls. Not all VoIP callers have telephone numbers, and the calling/originating network does not always own the number. Many legitimate calls are not originated on the public switched telephone network (“PSTN”) and, accordingly, do not originate from a telephone number. For example, outbound one-way calling applications permit calls to be made to PSTN telephone numbers but do not allocate telephone numbers to the calling party.

In scenarios where a subscriber owns a number on a remote (other) network, neither SHAKEN nor STIR allows for presenting the remote calling line ID on a home-network-originated call (*e.g.*, a SkypeOut customer might have a valid mobile telephone number but SHAKEN/STIR wouldn’t allow use of that for caller ID on SkypeOut). It is also not clear how international calls from countries not adopting SHAKEN will be treated on the U.S. network, nor is it clear whether the customers of voice providers not participating in SHAKEN will be able to complete outgoing calls. Industry is working, and will continue to work, on these and other issues concurrent with the testing and implementation of the SHAKEN/STIR framework.

II. Industry should retain primary responsibility for SHAKEN/STIR implementation with Commission oversight available as needed.

The Commission seeks comment on what entities could best serve as the governance authority over the SHAKEN/STIR model, including the potential role of the Commission.³ VON believes that industry is in the best position to implement and govern SHAKEN/STIR. However, the Commission should retain regulatory oversight to resolve any issues that may arise concerning competitive neutrality among voice service providers and technologies (e.g., changes in authentication procedures that may disadvantage over-the-top providers).

III. SHAKEN/STIR implementation cost recovery issues should be addressed.

The NOI seeks comment on how stakeholders might bear the costs of a call authentication system.⁴ As industry moves forward with testing and implementation of SHAKEN/STIR, including by working to address limitations of the SHAKEN/STIR framework, VON believes that discussion of a cost recovery mechanism should not be overlooked. As beneficial as call authentication could be to preventing illegal robocalls, it is not a silver bullet, and is only one part of the fight. Indeed, the effort must also include the Federal Trade Commission, international regulators, further technological solutions, consumer education, and coordination between law enforcement in the U.S. and abroad. Stakeholders must also acknowledge that robocallers will adapt, and that an inflexible system could lead to a situation where stakeholder payments are being made to fund a system that has been circumvented or is soon obsolete. Accordingly, the question of cost recovery also should be addressed in parallel with implementation of the SHAKEN/STIR model.

³ NOI ¶¶ 18-27.

⁴ NOI ¶ 47.

CONCLUSION

For the foregoing reasons, VON supports the Commission's proposals, consistent with the discussion above.

Respectfully submitted,

VOICE ON THE NET COALITION

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