

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054**

In the Matter of:]	
]	
Call Authentication Trust Anchor]	WC Docket No. 17-97
]	

COMMENTS

The Voice on the Net Coalition (“VON”)¹ files these comments in response to the Commission’s Public Notice seeking comments on the efficacy of the STIR/SHAKEN call authentication framework as a tool to combat illegal robocalls.² VON and its members have actively engaged in industry efforts to eliminate illegal robocalls, including through participation on the STI-GA Board. VON remains hopeful that the STIR/SHAKEN framework, when combined with other Commission requirements and industry initiatives, including traceback, will result in a meaningful reduction in both illegal robocalls and the potential fraud that may accompany those calls. One limiting factor that the Commission should address is steps to encourage IP interconnection across all networks; this will facilitate the ubiquitous deployment of STIR/SHAKEN and bring its benefits to all Americans with a telephone. Other limiting factors are briefly addressed as well.

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP-enabled communications, including interconnected Voice over Internet Protocol (“VoIP”). For more information, see www.von.org.

² Public Notice, DA-22-831, WC Docket No. 17-97 (rel. August 5, 2022); *see also* 87 FR 53,705 (September 1, 2022), establishing the October 3, 2022 deadline for comments.

STIR/SHAKEN REQUIRES IP INTERCONNECTION: The Commission has recognized since 2020 that the unavailability of IP interconnection could be an impediment to end-to-end STIR/SHAKEN.³ More recently, the North American Numbering Council’s Call Authentication Trust Anchor Working Group, addressed the problem in a paper call “Deployment of STIR/SHAKEN by Small Voice Service Providers.”⁴ The paper notes that local exchange carriers, particularly in rural areas, operate networks that largely rely on legacy TDM tandems to receive inbound calls from, or send outbound calls to, other carriers; surmising that IP interconnection is “either not available or is not an economically viable option.”⁵ Without access to IP interconnection, “the subscribers of such providers may have limited benefit from the TRACED Act.”⁶

The conundrum appears to be who will bear the cost to deliver calls to and from distant points of interconnection, or whether efficient solutions exist (regulatory or otherwise) that can fairly address those concerns.⁷ The CATA Paper recognizes that for many smaller providers with limited subscriber lines, peak bandwidth and capacity requirements do not justify dedicated physical connections to IP peers but that solutions may exist, including using the

³ See, *Report and Order and Further Notice of Proposed Rulemaking*, WC Docket 17-97 (rel. March 31, 2020)) at para. 85 and para. 35, fn 135 (“We recognize that the transmission of STIR/SHAKEN authentication information over a non-IP interconnection point is not technically feasible at this time.”).

⁴ A copy of the paper may be found on the Commission website at [October 13, 2021 CATA Working Group Report to NANC | Federal Communications Commission \(fcc.gov\)](#) (“CATA Paper”) (last visited September 19, 2022).

⁵ Id. at 5. See also, Reply Comments of NTCA, WC Docket No. 17-97 (filed September 16, 2022) at 5 (“the Commission must do everything in its power to promote IP interconnection and the exchange of calls in IP format so that they can be authenticated via STIR/SHAKEN.”)

⁶ CATA Paper at 5.

⁷ NTCA Reply Comments at 6-7.

public internet, that overcome the costs and burdens associated with physical direct interconnection points, but may raise security or quality of service concerns.⁸

VON and its members will continue to work diligently with other industry participants to develop commercial solutions to the SIP interconnection problem. However, given differences in the size and scope of those in the voice ecosystem, commercial arrangements may not always lead to palatable or equitable results for all parties, and in some cases may not be available to providers with smaller volumes of traffic. Currently available commercial agreements generally only include traffic from telephone numbers that are on VoIP or mobile OCNs or SPIDs. This means that wireline local and long-distance traffic will not be sent via IP interconnections even if that traffic reaches IP switches on the interconnecting party's network.⁹ VON encourages the Commission and the industry to continue to adopt solutions that address these commercial limitations, while acknowledging that there is still work to be done regarding the adoption of IP traffic exchange. In those situations, or if industry in the first instance cannot reach a consensus on solutions, the Commission should take more proscriptive action, as the CATA report recommends.¹⁰

OTHER LIMITING FACTORS.

- STIR/SHAKEN efficacy should not be solely based on how well it effectuates the authentication of caller ID information, which in and of itself may be lacking because of the relatively small percentage of signed calls received by the terminating carrier. As

⁸ CATA Paper at 12-14.

⁹ Without an IP mandate, there are providers that may route calls through TDM, which forces other providers in the call path to peer with each terminating carrier (which is cumbersome, expensive and complicated).

¹⁰ CATA Report at 15.

noted above, the Commission should mandate IP interconnection and eliminate TDM options.

- Call "labeling" companies are pushing enterprise customers to "pay-to-play" solutions to reduce the likelihood that those same call labelling companies may mislabel calls, and result in lower answer rates.
- Carriers should be promoting technologies that allow for differentiation and provide more information to subscribers so those subscribers can make choices themselves whether or not to answer calls.

CONCLUSION

The Commission should act in accordance with the recommendations herein.

Respectfully submitted,

VOICE ON THE NET COALITION

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