Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20054

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

REPLY COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net Coalition ("VON")¹ hereby submits these reply comments in response to the Commission's Sixth Report and Order and Further Notice of Proposed Rulemaking ("FNPRM") seeking comments on additional measures to strengthen the caller-ID framework and combat illegally spoofed robocalls.² VON has actively engaged in industry efforts to eliminate illegal robocalls, and its members have implemented STIR/SHAKEN and are committed to decreasing the number of robocalls. In these comments, VON addresses the FNPRM's questions regarding the use of third-party solutions to authenticate caller-ID information and whether the FCC should make any changes to its rules to permit, prohibit, or limit the use of third-party authentication. VON encourages the Commission to take necessary steps to encourage more STIR/SHAKEN utilization and asks that the FCC take no action to prohibit or limit a provider's ability to use third parties to authenticate caller-ID information. There is a real concern that limiting or eliminating third-party authentication could lead to unintended consequences which dampen the efforts already underway in the STIR/SHAKEN framework.

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 Call Authentication Trust Anchor, WC Docket No. 17-97, Sixth Report and Order and Sixth Further Notice of Proposed Rulemaking, FCC 23-18 (rel. Mar. 17, 2023) ("FNPRM"); see also, 88 Fed. Reg. 29035 (May 5, 2023) (establishing a reply comment deadline of July 5, 2023).

DISCUSSION

As other commenters stated, third-party caller-ID authentication plays an important role in the STIR/SHAKEN framework by increasing the signing options available to providers that may be otherwise unable to sign their own calls.³ Somos, Inc. explained that when an entity places an outbound call using toll-free numbers, the originating service provider may lack the necessary information to authenticate caller-ID information, and "this gap in the STIR/SHAKEN framework can prevent valid toll-free calls from receiving proper authentication." However, Somos, Inc. notes that utilizing third-party authentication to fill that gap can actually "strengthen the STIR/SHAKEN framework by ensuring that authentic toll-free calls receive proper verification, while illegal robocalls continue to be flagged for consumers." Should the Commission prohibit or even limit the use of third-party authentication, it could constrain the progress that the STIR/SHAKEN framework has made in the fight against illegal robocalls.

INCOMPAS asserts that "there is considerable benefit to the first STIR/SHAKEN-capable provider in a call chain signing the calls that it receives and passes downstream for termination." As such, the process of third-party caller-ID authentication advances the goals of the STIR/SHAKEN framework by increasing the number of calls that will be authenticated.

Additionally, the Cloud Communications Alliance ("CCA") addressed concerns that thirdparty authentication could undermine the STIR/SHAKEN framework. As CCA explains, "there is insufficient evidence that third party authentication causes harm" or undermines

See, INCOMPAS Comments, WC Docket No. 17-97, filed June 5, 2023, at 4, 11-12.

See, Somos, Inc. Comments, WC Docket No. 17-97, filed June 5, 2023, at 3.

⁵ Id. at 3-4.

⁶ INCOMPAS Comments, at 10.

STIR/SHAKEN.⁷ CCA maintains that any alleged harms from third-party authentication have not been proved, and the concrete benefits of an increase in the number of calls signed with A- and B-level attestations far outweighs any speculative harms.⁸ CCA also notes that should the FCC restrict or eliminate third-party authentication, it could have unintended consequences, such as disruptions to current ATIS-compliant arrangements, or calls that should appropriately receive an A- or B-level attestation from a third-party being downgraded to a C-level attestation.⁹

Moreover, third-party authentication is permitted by the industry-developed technical standard, and is permitted in other countries that have implemented STIR/SHAKEN, e.g., Canada and, as of next month, France. If the Commission were to impose third-party authentication restrictions, it would create a variance from the technical standard and from other national implementations of that standard, thereby complicating eventual efforts to enable interoperability of the U.S. STIR/SHAKEN mechanism with those of other countries. This would, in turn, undermine or complicate the effort to enable more internationally originated traffic to be SHAKEN-signed and recognized by U.S. terminating providers.

Because the benefits of third-party solutions to authenticate caller-ID information far outweigh any potential pitfalls, VON joins several other commenters in urging the FCC against making any changes to its rules that would prohibit or limit the use of third-party authentication.

⁷ See, Cloud Communications Alliance Comments, WC Docket No. 17-97, filed June 5, 2023, at 8.

⁸ Id. at 12-13.

⁹ Id.

CONCLUSION

The Commission should act in accordance with the recommendations herein.

Respectfully submitted,

VOICE ON THE NET COALITION

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