



## 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.<sup>3</sup> 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.”<sup>4</sup> 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.”<sup>5</sup> 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.”<sup>6</sup> 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 third-party authentication could undermine the STIR/SHAKEN framework. As CCA explains, “there is insufficient evidence that third party authentication causes harm” or undermines

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<sup>3</sup> See, INCOMPAS Comments, WC Docket No. 17-97, filed June 5, 2023, at 4, 11-12.

<sup>4</sup> See, Somos, Inc. Comments, WC Docket No. 17-97, filed June 5, 2023, at 3.

<sup>5</sup> Id. at 3-4.

<sup>6</sup> INCOMPAS Comments, at 10.

STIR/SHAKEN.<sup>7</sup> 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.<sup>8</sup> 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.<sup>9</sup>

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.

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

<sup>8</sup> *Id.* at 12-13.

<sup>9</sup> *Id.*

## **CONCLUSION**

The Commission should act in accordance with the recommendations herein.

Respectfully submitted,

### **VOICE ON THE NET COALITION**

/s/ Glenn S. Richards

Glenn S. Richards

Betsy Craig

PILLSBURY WINTHROP SHAW PITTMAN LLP

1200 Seventeenth Street, N.W.

Washington, DC 20036-3006

(202) 663-8000

*Its Counsel*

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