

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

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

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net (“VON”) Coalition¹ hereby submits these comments in response to the Notice of Proposed Rulemaking (the “NPRM”),² wherein the Commission asks how to address the caller ID authentication gap resulting from non-Internet Protocol (IP) networks that are unable to support STIR/SHAKEN. Ostensibly, while this proceeding is focused on illegal robocalls, the lack of ubiquitous IP networks also unnecessarily increases the costs of providing voice services and impacts the enablement of Next Generation 911. VON encourages the Commission to close the gap by requiring all voice service providers (“VSPs”) to transition to IP networks by December 31, 2028 or two years after the effective date of rules adopted in this proceeding, whichever is later.

DISCUSSION

For more than 12 years the Commission has grappled with how to accelerate the nation’s transition from TDM voice networks to IP networks.³ Despite broad industry and Commission support, there is no mandate or target date for all networks in the United States

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of internet communications. See www.von.org.

² *Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. April 29, 2025); See also, 90 Fed. Reg. 25186 (June 16, 2025)(establishing a comment date of July 16, 2025).

³ See, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, WC Docket No. 12-353 (filed Nov. 7, 2012).

to operate in IP. The NPRM tries to address this conundrum, by proposing a rule that would permit a non-IP network VSP to comply with its call authentication obligations by “completely upgrading its non-IP networks to IP and implementing the STIR/SHAKEN authentication framework on its entire network,” but undermines that effort by alternatively allowing compliance by “implementing one or more effective non-IP caller ID authentication frameworks.”⁴ The Commission also proposes a two-year timeline for providers that continue to maintain non-IP infrastructure to either complete their IP transition or to fully implement a non-IP caller ID authentication framework, commencing from the effective date of any adopted rules.⁵

VON supports the Commission’s proposal to modify Section 64.6303 of its rules to mandate that VSPs upgrade their networks to IP in order to comply with Section 4(b)(1)(B) of the TRACED Act requiring that VSPs implement an effective call authentication framework in their non-IP networks. This approach would best promote the IP transition, is the most effective method for achieving caller ID authentication, and obviates the need for providers to implement non-IP caller ID authentication frameworks.⁶ VON agrees with the Commission that “A complete IP transition remains the best solution to achieving ubiquitous caller ID authentication, as it will enable providers to implement STIR/SHAKEN without additional regulatory requirements.”⁷

VON recommends that the Commission require compliance with the rule by December 31, 2028, or two years after the effective date of rules adopted in this proceeding, whichever is later. This generous deadline is nine years after the passage of the TRACED Act, and provides

⁴ NPRM at para. 44.

⁵ Id. at para. 47.

⁶ Id. at para. 44.

⁷ Id. at para. 4.

VSPs more than enough time to update their networks. A VSP that cannot meet the deadline can request a waiver if it can demonstrate that the grant of such waiver is in the public interest.⁸

VON opposes the Commission's proposal allowing VSPs the option to instead implement a non-IP caller ID authentication framework. While this band aid may address the immediate concern of STIR/SHAKEN compliance, it ignores the other burdens imposed on the communications ecosystem by the continued support of outdated, inefficient TDM networks.⁹ On the other hand, ubiquitous IP networks connected with SIP trunking will promote IP interconnection, reduce energy costs, allow for increased network reliability, security and redundancy, and lower costs for call origination and termination because there is no longer a need for expensive third-party transit providers.¹⁰

The Commission has a unique opportunity in this proceeding to move the entire VSP ecosystem into the 21st century. While TDM networks may have revolutionized communications in 1960s, their continued existence is hampering technological innovation and access to next generation services. The Commission should act boldly today, so that we can all watch the final sunset of the PSTN.

⁸ 47 CFR § 1.925.

⁹ See Letter from Steven Morris, NCTA, to Marlene Dortch, FCC Secretary, WC Docket No. 17-97 (June 11, 2025) ("... (t)he continued need to use TDM equipment for those network interconnections imposes ongoing and unnecessary costs and inefficiencies on IP-based network providers by requiring them to either maintain their own TDM equipment or use a third party to facilitate the TDM interconnection.")

¹⁰ See, Accelerating Network Modernization: Lessons from TDM to Next-Gen Connectivity, prepared by the American Council for Technology-Industry Advisory Council (released April 17, 2025); found at <https://www.actiac.org/system/files/2025-04/TDM%20Retirement%20Final%20Paper.pdf> (last visited June 25, 2025).

CONCLUSION

The Commission should act in accordance with the recommendations herein.

Respectfully submitted,

VOICE ON THE NET COALITION

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