

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

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

REPLY COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net (“VON”) Coalition¹ hereby submits this reply in response to the comments filed in the above-referenced docket,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. The lack of consensus on a path forward strongly suggests that that Commission adopt the VON proposal 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. Otherwise, the full benefits of the STIR/SHAKEN approach will remain unrealized.

DISCUSSION

There is widespread support in the comments for reducing illegal robocalls and improving call authentication. However, parties have raised serious concerns with the non-IP call authentication standards that would serve as surrogates for those VSPs delaying a transition to fully IP networks. As CTIA notes, “introducing unproven and insecure non-IP standards to the call authentication space threatens to undermine the significant resources

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) (the “NPRM”); See also, 90 Fed. Reg. 25186 (June 16, 2025)(establishing a reply comment date of August 15, 2025).

devoted to, and progress already made in, implementing STIR/SHAKEN throughout the voice ecosystem over the last decade.”³

According to USTelecom, the in-band and out-of-band proposals cited in the NPRM fall short of meeting the FCC’s goals of protecting consumers from unlawful robocalls or unleashing the transition to IP; and fail to satisfy TRACED Act requirements. It concludes that there is no reason to compel providers to invest in legacy TDM infrastructure which is rapidly becoming obsolete.⁴ Instead, USTelecom suggests that IP-based voice service traffic exchange solutions are available today that can be made available to interconnection partners and customers that will solve the TDM-in-the-middle challenge.⁵

TransNexus adds that In-Band Authentication mechanisms that simply relay the attestation level and/or require the creation of a new PASSporT downstream from the OSP do not meet the objectives of the TRACED Act and Commission rules, suggesting it would be unfair to impose an undue cost burden on service providers that develop and support their STIR/SHAKEN system.⁶ While TransNexus suggests that the Out-of-Band protocol might suffice, it requires a new governance structure – something industry may not support.⁷

Two commenters, AB Handshake and ICA AI, ask the Commission to confirm their proprietary solutions satisfy the TRACED Act’s non-IP call authentication requirements.⁸ One commenter suggests reducing the proposed two-year timeframe to implement non-IP

³ Comments of CTIA, WC Docket 17-97, filed July 16, 2025 at 4.

⁴ Comments of USTelecom, WC Docket 17-97, filed July 16, 2025 at 2.

⁵ Id. at 5.

⁶ Comments of TransNexus, WC Docket 17-97, filed July 16, 2025 at 9.

⁷ Id. Numeracle also supports the out-of-band solution, while recognizing it is “not perfect.”

Comments of Numeracle, WC Docket 17-97, filed July 16, 2025 at 1.

⁸ Comments of AB Handshake, WC Docket 17-97, filed July 16, 2025 at 4; Comments of ICA AI, WC Docket 17-97, filed July 16, 2025 at 10.

solutions to one year,⁹ two others suggest that two years may not be enough time.¹⁰

INCOMPAS, like VON, supports an FCC mandate that networks upgrade to IP by a specified date.¹¹ VON agrees with INCOMPAS and NCTA that the costs to upgrade to IP or to implement non-IP call authentication, including hardware and software, must be borne solely by the TDM providers, not IP-based providers, who have already spent significant resources implementing STIR/SHAKEN.¹²

VON also supports those recommendations that would facilitate IP interconnection. Like other commenters, VON members have similarly faced challenges in obtaining fair and reasonable IP interconnection terms from large telecom providers.¹³ NTCA notes that its members' requests to interconnect in IP for voice traffic are often rebuffed.¹⁴ TransNexus adds that most voice service providers have IP-capable switches, yet are forced to use non-IP interconnections by some interconnection partners.¹⁵ As a possible solution, NCTA suggests that the Commission convene a working group to address network interconnection and traffic exchange.¹⁶ While VON does not oppose a working group and would be willing to participate, a specific FCC directive for all carriers to support IP interconnections on reasonable terms and conditions would be far more timely and effective.

Transitioning to all IP networks was the FCC's original goal when it established STIR/SHAKEN implementation requirements, and should continue to be, because that is the

⁹ Comments of The American Bankers Association, WC Docket 17-97, filed July 16, 2025 at 6.

¹⁰ Comments of NTCA, WC Docket 17-97, filed July 16, 2025 at 16; Comments of Competitive Carriers Association, WC Docket 17-97, filed July 16, 2025 at 2.

¹¹ Joint Comments of INCOMPAS and the Cloud Communications Alliance, WC Docket 17-97, filed July 16, 2025 at 1.

¹² Id. at 4; Comments of NCTA, WC Docket 17-97, filed July 16, 2025 at 2.

¹³ Comments of Competitive Carriers Association at 4.

¹⁴ NTCA Comments at 13.

¹⁵ TransNexus Comments at 28.

¹⁶ NCTA Comments at 4.

best way to secure all networks, reduce illegal robocalls and provide cost savings for those providers who have spent significant resources deploying IP networks. The Commission should not in this proceeding adopt unreliable solutions that will be obsolete before they are implemented, impose unnecessary costs or delays on the ecosystem and (again) put off until tomorrow the solution that ALL parties agree would be the most effective – a transition to all IP networks.

Accordingly, VON strongly recommends that the Commission require all 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. This generous deadline is nine years after the passage of the TRACED Act, and provides VSPs more than enough time to update their networks.

CONCLUSION

The Commission should act in accordance with the recommendations herein.

Respectfully submitted,

VOICE ON THE NET COALITION

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