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") Coalition[1] hereby submits these comments in response to the Public Notice[2] wherein the Commission seeks comment on the efficacy of STIR/SHAKEN for authenticating caller ID information, as required by the TRACED Act, as the Commission prepares its second triennial report to Congress. VON members believe that STIR/SHAKEN is an important tool (among many) to achieve their and the Commission's goal to impede and reduce illegal robocalls and look forward to continuing to work with the industry and the Commission to make STIR/SHAKEN more effective.

[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] Public Notice, WC Docket No. 17-97, DA 25-763 (rel. Aug. 27, 2025); See also, 90 Fed. Reg. 42578 (September 3, 2025)(establishing a comment date of October 3, 2025). The comment date was extended to November 18, 2025 as a result of the federal government shutdown. See, Public Notice, DA 25-937 (rel. November 13, 2025). Specific questions include: 1) whether there are ways STIR/SHAKEN could be more effective at authenticating caller ID information; 2) whether any specific factors limit STIR/SHAKEN's efficacy, and what solutions might resolve these issues; 3) whether there have been other developments that affect the efficacy of STIR/SHAKEN, and how should any such developments be factored into the Commission's assessment; and 4) whether the Commission should revise STIR/SHAKEN or replace it with a different framework.

DISCUSSION

Regulators and the telecommunications industry worldwide have been looking for a solution that would end illegal robocalls. Neither STIR/SHAKEN nor any other solution, such as blocking of international calls or limits on number allocation, have proven to be a silver bullet to solve this complicated problem. That is not a reason to give up on STIR/SHAKEN but an opportunity to build upon it and try to stay one step ahead of bad actors.

STIR/SHAKEN promotes caller ID authenticity and supports industry traceback efforts for potentially fraudulent or spoofed calls. When used appropriately, along with other analytics, the call attestation process inherent in STIR/SHAKEN can provide critical information for intermediate and terminating voice service providers ("VSPs"), and ultimately their end user customers, the called party, on how or whether to deliver or label a telephone call. Moreover, STIR/SHAKEN has benefits that are not yet being recognized. For example, the ITG traceback process could be streamlined by starting with the provider who signed the call and working backwards from there instead of going through each and every hop. It is important not to place the entire responsibility for ending illegal robocalls on a single tool such as STIR/SHAKEN.

As worldwide efforts demonstrate, an effective approach will require a multitude of tools, and industry and the Commission must continue to assess how better to use those tools and which new tools to add to the toolbox. The Commission and industry should not look at any single tool in isolation, determine it is ineffective on its own, and abandon it when no better or more effective solution is available. Instead, the Commission and industry should be looking to what works with STIR/SHAKEN, such as the implementation of robocall mitigation plans, "know your customer" principles, federal and state enforcement of robocall

regulations, and building upon that framework, not subtracting from it.

Finally, we cannot fully judge the efficacy of STIR/SHAKEN until the IP transition is complete. Once the STIR/SHAKEN header makes it entirely through the call path for all calls, we will have a clearer picture of how STIR/SHAKEN has worked, how it can be improved, and how it can be better utilized for caller name verification as well as number verification.

In the meantime, the Commission and STI/GA can take actions to improve the efficacy of STIR/SHAKEN. The Commission must address the caller ID authentication gap resulting from non-Internet Protocol (IP) networks that are unable to support STIR/SHAKEN. Industry estimates that more than 60 percent of calls signed by an originating service provider will not include attestation details when received by the terminating service provider. In a separate proceeding, VON has recommended that Commission close the gap by requiring all VSPs to transition to IP networks by December 31, 2028 or two years after the effective date of rules adopted in that proceeding, whichever is later.[3] 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.

In addition, the STI/GA, industry, regulators and consumer organizations can continue educating industry and calling parties about how STIR/SHAKEN works and help reduce any confusion about what STIR/SHAKEN can and should not do.

[3] Comments of the Voice on the Net Coalition, WC Docket 17-97, filed July 16, 2025.

CONCLUSION

STIR/SHAKEN is an effective resource for call authentication and supporting industry traceback efforts. When used in cooperation with other Commission and industry robocall reduction initiatives, it provides a strong framework for protecting consumers and restoring trust in the public telephone network.

Respectfully submitted,

VOICE ON THE NET COALITION

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