
Call Authentication NOI Brings Suggestions, Mandates Disagreement

Putting limits on legal blocking of calls and making voice providers offer free caller ID authentication by the end of 2018 were among filers' suggestions in comments in docket 17-97 on a call authentication notice on inquiry. There also was broad, but not universal, opposition to mandating any approach. Commissioners adopted the NOI at the July meeting (see [1707130054](#)), with comments due Monday and replies Sept. 13.

The Signature-based Handling of Asserted Information Using toKENs (Shaken) and Secure Telephone Identity Revisited (Stir) framework is the most promising means of comprehensively tackling illegal spoofed robocalls, Comcast [said](#). It said voice providers already have incentives to deploy Shaken-Stir, and the FCC should look at other measures to ensure universal adoption, such as facilitating the IP transition, setting up regulatory safe harbors and encouraging participation by providers of IP-based voice services.

Industry groups opposed Shaken-Stir framework adoption mandates. With the transition of voice networks to IP-based technology years from completion, setting Shaken-Stir-based regulatory requirements now would be premature, NCTA [said](#), saying the FCC should instead give industry groups "time and flexibility to continue making progress." It said naming a policy administrator and governance authority also would be premature. USTelecom, pushing for FCC-encouraged standards instead of mandated ones, [said](#) the agency also should push international efforts to deploy Shaken-Stir standards and implementation. It said only Canada and the U.K. expressed interest in the protocol, and the FCC should avoid approaches that might discourage other countries.

Neustar, also against mandated deployment, [said](#) the FCC should set timelines and milestones for development and for testing and validation of implementation. Voice on the Net Coalition said industry should be primarily responsible for implementation, with the FCC maintaining oversight to resolve any competitive neutrality issues among voice service providers and technologies. VON's [website](#) shows members include AT&T, Google, Microsoft and Skype.

Shockey Consulting principal and SIP Forum Chairman Richard Shockey [said](#) the Shaken-Stir system won't work unless mandated, pointing to local number portability's success via mandate. He

said universal implementation of Shaken-Stir could take up to five years. He also estimated cost of operation of a trust anchor, including startup costs, would be at most \$20 million annually.

Telemarketing industry group Professional Association for Customer Engagement **said** the FCC should limit legal blocking to only calls that purport to originate from numbers that subscribers have requested be blocked, invalid numbers, numbers not associated with a carrier and a carrier's own unassigned numbers. It said since there's not a central database of allocated but unassigned numbers, the agency should shy from mandating the blocking of calls purporting to come from allocated but unassigned numbers.

Public interest and consumer groups urged the FCC **jointly** to go further and require voice providers - along with the free caller ID authentication -- offer free blocking of calls that fail to verify ID information. They said all voice customers should get the same protections from fraudulently spoofed calls; the ID authentication system should protect from overseas spoofed calls; and consumers should have the option of verifying the legitimacy of calls they make while still withholding personal identifying information from the recipient. Signing were Consumers Union, Consumer Action, Consumer Federation of America, National Association of Consumer Advocates, National Consumer Law Center, Public Citizen and Public Knowledge.

Commenters disagreed who could fill the roles of policy administrator and governance authority. CTIA **said** neither of the organizations named by the FCC as possible policy administrator -- North American Numbering Plan Administration (NANPA) or local number portability administration -- is an obvious fit; it said the same about North American Numbering Council (NANC) having a roll in governance. Neustar endorsed NANC for governance authority and said the NANPA should be policy administrator. Alliance for Telecommunications Industry Solutions **said** it could be the governance authority that would define the policies and procedures governing which entities can get secure telephone identity certificates and which entities can manage public key infrastructure. It said the job of policy administrator should be separate from governance authority.

Small interconnected VoIP providers had little role in developing the Shaken-Stir standards, and the FCC needs to be sure not to underestimate difficulties they could face, the American Cable Association **said**. It pushed for the agency to consider a rolling adoption schedule for smaller VoIP providers.

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