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In the Matter of)	
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Call Authentication Trust Anchor)	WC Docket No. 17-97
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June 5, 2023

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INTRODUCTION AND SUMMARY

The Commission has made important strides in combating illegally spoofed robocalls by adopting the STIR/SHAKEN caller ID authentication framework.¹ The Commission should strengthen this framework by explicitly permitting third-party authentication by Responsible Organizations (“Resp Orgs”) for calls placed from Toll-Free Numbers (“TFNs”), as authorized by the Alliance for Telecommunications Industry Solutions (“ATIS”) Standard on Toll-Free Numbers in the SHAKEN Framework.² Further, the Commission should mandate all service providers to accept delegate certificates as outlined in the ATIS-1000093 standard.

The STIR/SHAKEN framework relies in part on a certificate governance process to maintain trust in the caller ID authentication information transmitted with a call.³ When entities place outbound calls using TFNs, which are assigned and administered by Resp Orgs, the originating service provider typically lacks the necessary information to authenticate caller ID information. This gap in the STIR/SHAKEN framework can prevent valid toll-free calls from receiving proper authentication.

Third-party authentication by Resp Orgs can fill that gap. Because Resp Orgs possess the necessary information to verify their customers’ TFNs, they can use delegate certificates to authenticate these calls for originating providers, following the ATIS-1000093 standard.⁴ Third-party authentication by Resp Orgs strengthens the STIR/SHAKEN framework by ensuring that

¹ See Sixth Report and Order and Further Notice of Proposed Rulemaking, *Call Authentication Trust Anchor*, WC Docket No. 17-97, FCC 23-18, ¶¶ 2, 4 (rel. Mar. 17, 2023) (“2023 NPRM”).

² ATIS & SIP Forum, ATIS Standard on Toll-Free Numbers in the SHAKEN Framework, ATIS-1000093 (2020) (“ATIS-1000093”), https://access.atis.org/apps/group_public/document.php?document_id=56853.

³ See 2023 NPRM ¶¶ 5, 6.

⁴ ATIS-1000093 at 6.

authentic toll-free calls receive proper verification, while illegal robocalls continue to be flagged for consumers. Accordingly, the Commission should explicitly permit third-party authentication of TFNs by Resp Orgs.

DISCUSSION

A. Resp Orgs Currently Use Delegate Certificates To Authenticate Calls from Their Customers' TFNs.

The Commission seeks comment “on the types of third-party authentication solutions being used by providers.”⁵ Resp Orgs currently use delegate certificates to authenticate calls from their customers' TFNs, consistent with industry standards. In 2020, ATIS, in conjunction with the SIP Forum, produced standards “us[ing] the currently defined STIR/SHAKEN framework to process calls where the calling party number is a TFN” through delegate certificates by Resp Orgs.⁶ The industry-led Secure Telephone Identity Governance Authority (“STI-GA”) board also voted in 2021 to support the use of delegate certificates by Resp Orgs to authenticate calls from TFNs.⁷

This approach makes sense. Resp Orgs manage and administer TFNs and provide routing reference information in the TFN Registry (“TFNR”), a database that contains

⁵ 2023 NPRM ¶ 98.

⁶ ATIS-1000093 at 1. Notably, ATIS promulgated the standards that the Commission adopted for STIR/SHAKEN compliance by originating voice service providers. *See* 2023 NPRM ¶ 21 (“Voice service providers and gateway providers are obligated to comply with, *at a minimum*, the version of the STIR/SHAKEN standards ATIS-1000074, ATIS-1000080, and ATIS-1000084 and all of the documents referenced therein in effect at the time of their respective compliance deadlines[.]”).

⁷ *See* Press Release, ATIS, *STI-GA Announces Policy Changes to Support Delegate Certificates and Toll-Free* (July 26, 2021), <https://www.atis.org/press-releases/sti-ga-announces-policy-changes-to-support-delegate-certificates-and-toll-free/>.

information on the status of all toll-free numbers. When a customer requests a TFN, it must select a Resp Org to reserve a TFN from the pool of available numbers within the TFNR.

The Commission's rules require originating service providers to authenticate and verify caller ID information consistent with the STIR/SHAKEN protocol and attestation process.⁸ But, in some scenarios, originating providers lack the information necessary to establish that a call is legitimate. This is often the case when an entity places a call using a TFN obtained from a Resp Org. The originating provider for a call from a TFN is not usually the Resp Org that assigned the TFN to the end-user. The providers therefore may not be able to attest to the caller's right to use the TFN. In those cases, the Resp Org can determine that the party has the right to use that TFN and provide this information to the originating provider using delegate certificates.⁹ Using this mechanism, the originating provider can authenticate valid toll-free calls that may otherwise be unverifiable.

B. The Commission Should Explicitly Authorize Third-Party Authentication of TFNs by Resp Orgs and Mandate Acceptance of Delegate Certificates by Providers.

The Commission also asks whether it should amend its rules to explicitly authorize the use of third-party authentication by originating providers to comply with their STIR/SHAKEN obligations.¹⁰ However the Commission may decide to address this issue more generally, permitting third-party authentication of TFNs by Resp Orgs would strengthen the reliability of

⁸ See Report and Order and Further Notice of Proposed Rulemaking, *Call Authentication Trust Anchor; Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, 35 FCC Rcd 3241, ¶ 3 (2020).

⁹ See ATIS-1000093 at 6-8 (describing “the process for issuing delegate end-entity certificates to a VoIP Entity for a TFN”).

¹⁰ See 2023 NPRM ¶ 98.

the STIR/SHAKEN framework, further its objective of curtailing illegal spoofing, and reinforce the integrity and utility of TFNs.

Pursuant to the Commission’s rules, Resp Orgs are the designated agents for toll-free subscribers to obtain TFNs.¹¹ Resp Orgs are the only parties who assign and administer toll-free numbers in the TFNR.¹² Given their responsibility for assignment and routing of TFNs, as well as their direct relationships with toll-free subscribers, Resp Orgs are in the best position to authenticate calls placed by TFNs.

Without Resp Org authentication, originating providers may be unable to verify valid toll-free calls. As a result, calls from TFNs risk receiving lower attestation and answer rates than other calls. Consumers may mistake authentic toll-free calls for illegal robocalls, leading to confusion and undermining trust in the STIR/SHAKEN framework.¹³ To protect against those negative outcomes, the Commission should explicitly approve third-party authentication by Resp Orgs and ensure that delegate certificates from Resp Orgs are recognized as valid in the STIR/SHAKEN framework. Authorizing Resp Org authentication would strengthen the reliability of the STIR/SHAKEN ecosystem by verifying valid calls that would otherwise be transmitted without authentication.

Third-party authentication by Resp Orgs does not implicate privacy or security concerns.¹⁴ Resp Orgs can reliably authenticate calls from TFNs, given that they already manage

¹¹ See Order, *Provision of Access for 800 Service*, 8 FCC Rcd 1423, ¶ 19 (1993) (“For each 800 number, only one entity, the RESPORG, will have authority to access the SMS in order to input or change service information with respect to that number.”).

¹² See *id.*; see also ATIS-1000093 at 2.

¹³ See Christopher Cole, *Legit Calls Routed As Spam, Provider Tells FCC*, Law360 (May 30, 2023), <https://www.law360.com/articles/1682632/legit-calls-routed-as-spam-provider-tells-fcc>.

¹⁴ See 2023 NPRM ¶ 97.

TFNs and provide routing reference information in the TFNR. Moreover, Resp Orgs must demonstrate relevant technical competence and financial responsibility to receive accreditation by Somos, which requires training and successful completion of an exam on toll-free industry practices.¹⁵ Somos also maintains ID numbers for each Resp Org, making them readily identifiable and accountable.¹⁶

Along with authorizing the use of third-party authentication by Resp Orgs, the Commission should also mandate the universal acceptance of delegate certificates from Resp Orgs across the entire STIR/SHAKEN ecosystem. Somos understands that some service providers will not accept any delegate certificates, rendering the ATIS-1000093 standard useless.

For TFNs, the Resp Org is the agent for the subscriber.¹⁷ While many service providers are Resp Orgs, most Resp Orgs are not service providers. When a service provider fails to accept delegate certificates from non-provider Resp Orgs, they may harm famous brands and well-known TFNs. Enterprises placing legitimate outbound calls from these TFNs cannot achieve the “A” attestation they deserve, which not only harms that enterprise’s brand, but decreases trust and damages the integrity of TFNs. For these reasons, the Commission should require acceptance of Resp Org delegate certificates by all service providers.

CONCLUSION

The Commission has taken important steps to protect consumers from illegally spoofed robocalls by adopting the STIR/SHAKEN caller ID framework. But a gap exists in the

¹⁵ See ATIS-1000093 at 9; Somos, Inc., *Responsible Organization Training & Certification Registration*, <https://www.somos.com/responsible-organization-training-certification-registration> (last visited June 5, 2023).

¹⁶ See ATIS-1000093 at 9.

¹⁷ See 47 C.F.R. § 52.101(b).

framework when calls are placed using TFNs that were not assigned by the originating provider. Third-party authentication of TFNs by Resp Orgs can fill that gap. The Commission should explicitly authorize this practice to strengthen the STIR/SHAKEN framework and better protect consumers from unwanted and illegal robocalls.

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