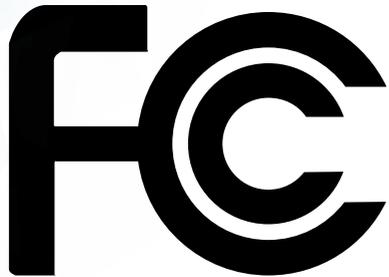




North American Numbering Council

STIR/SHAKEN Implementation and Next Steps



CJ Ferraro

Attorney Advisor

Wireline Competition Bureau

Competition Policy Division

May 5, 2020

Background

- In June 2019, the Commission adopted a Notice of Proposed Rulemaking that proposed requiring voice service providers to implement the STIR/SHAKEN framework, if major voice service providers failed to do so by the end of the year.
- In December 2019, Congress enacted the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.
 - The TRACED Act includes a number of provisions on call authentication and combatting robocalls generally, including direction for the Commission to mandate STIR/SHAKEN implementation not later than 18 months after the date of enactment.

Report and Order

- On March 31, 2020, the Commission adopted rules that require originating and terminating voice service providers to implement the STIR/SHAKEN caller ID authentication framework in the Internet Protocol (IP) portions of their networks by June 30, 2021.
- This timeline harmonizes the Congressional direction of the TRACED Act with the Commission's June 2019 Notice of Proposed Rulemaking.
 - The June 30, 2021 deadline provides sufficient time for the Commission to implement, and for voice service providers to gain, a meaningful benefit from the implementation exemption and extension mechanisms established by the TRACED Act.

Report and Order (Continued)

- The implementation mandate contains three requirements:
 - **First**, a voice service provider that originates a call that exclusively transits its own network must authenticate and verify the caller ID information consistent with the STIR/SHAKEN authentication framework;
 - **Second**, a voice service provider originating a call that it will exchange with another voice service provider or intermediate provider must authenticate the caller ID information in accordance with the STIR/SHAKEN authentication framework and, to the extent technically feasible, transmit that caller ID information with authentication to the next provider in the call path;
 - **Third**, a voice service provider terminating a call with authenticated caller ID information it receives from another provider must verify that caller ID information in accordance with the STIR/SHAKEN authentication framework.

Report and Order (Continued)

- In this Report and Order, the Commission declined to adopt any rules regarding display of the information derived from STIR/SHAKEN to customer.
- The Commission also declined to impose any new regulations on the STIR/SHAKEN governance structure.

Further Notice of Proposed Rulemaking

- The Further Notice offers proposals and seeks comment on further efforts to promote caller ID authentication and implementation of several sections of the TRACED Act.
 - **First**, the Further Notice proposes to extend the STIR/SHAKEN implementation mandate to intermediate providers for IP calls that they pass to both terminating voice service providers and subsequent intermediate providers to ensure that all calls benefit from STIR/SHAKEN, including those which transit the network of an intermediate provider.
 - **Second**, it seeks comment on the burdens and barriers to implementation faced by certain categories of providers.

Further Notice of Proposed Rulemaking (Continued)

- **Third**, the Further Notice proposes to grant an extension for compliance with the STIR/SHAKEN implementation mandate for certain categories of providers, specifically small voice service providers and voice service providers that materially rely on non-IP networks.
- **Fourth**, it proposes to require providers using non-IP technology, which cannot support STIR/SHAKEN, to either (i) upgrade their networks to IP to enable STIR/SHAKEN implementation or (ii) work to develop non-IP caller ID authentication technology.
- **Fifth**, the Further Notice proposes to create a process by which providers may be exempt from the STIR/SHAKEN implementation mandate if the Commission determines they have achieved certain implementation benchmarks.

Further Notice of Proposed Rulemaking Continued

- **Sixth**, the Further Notice proposes to prohibit voice service providers from imposing additional line item charges on consumer and small business subscribers for caller ID authentication.
- **Seventh**, it seeks comment on whether and how to address any risks of consumer confusion or competitive issues stemming from call labeling.
- **Finally**, the Further Notice seeks comment on whether and how to modify the Commission's policies regarding access to numbering resources to help reduce illegal robocallers' access.

Questions / Contacts

- **Comment and Reply Comment Deadlines**

- Comment Date: May 15, 2020
- Reply Comment Date: May 29, 2020

- **Contact Information**

- CJ Ferraro
 - Attorney Advisor
 - (202) 418-1322
 - connor.ferraro@fcc.gov
- Mason Shefa
 - Attorney Advisor
 - (202) 418-2962
 - mason.shefa@fcc.gov