

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

**COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of the Secure Telephone Identity Governance Authority Board (STI-GA Board) hereby submits these comments in response to the *Second Further Notice of Proposed Rulemaking* released January 14, 2021, in the above-referenced docket. As noted below, the STI-GA Board supports the recommendation that the Commission have a role in reviewing SPC token revocation decisions made by the Governance Authority. As explained more fully below, the STI-GA Board also agrees that it should and will provide materials related to its revocation decision to the Commission as part of the Commission’s review process.

I. BACKGROUND

The STI Governance Authority (STI-GA) is the industry-led effort operating under the auspices of ATIS¹ that supports the timely deployment of the STIR/SHAKEN protocol and framework. The STI-GA Board, which governs the SHAKEN-based call authentication

¹ As a leading technology and solutions development organization, ATIS brings together the top global ICT companies to advance the industry’s business priorities. ATIS’ 150 member companies are currently working to address 5G, robocall mitigation, Smart Cities, artificial intelligence-enabled networks, distributed ledger/blockchain technology, cybersecurity, IoT, emergency services, quality of service, billing support, operations, and more.

ecosystem, is comprised of stakeholders from a broad cross-section of the U.S. voice service industry.² The STI-GA Board develops policies and procedures related to the use of SHAKEN certificates, including the Service Provider Code token Revocation Policy that details how the STI-GA will address complaints due to an alleged violation of a policy, technical or legal requirement.

The STI-GA Board coordinates with the Commission as needed on policy and enforcement matters. The Commission has recognized the neutral and independent nature of the STI-GA Board, and found that it “is not necessary for the Commission to have a role in STIR/SHAKEN governance.”³ The Commission further recognized the neutrality of the current STI-GA make-up saying, “because the Governance Authority is made up of a variety of stakeholders representing many perspectives, we have no reason to believe it will not operate on a neutral basis.”⁴ The Commission’s faith in the STI-GA’s neutrality was reiterated in its *Second Report and Order*.⁵

II. Comments

In the *Second FNPRM*, the Commission proposes that it should have a role in reviewing SPC token revocation decisions made by the Governance Authority.⁶ The Commission explains

² The STI-GA Board consists of: Clinton Lee, Jackson Energy Authority (appointed by the American Cable Association); Nathan Sutter, Nex-Tech Wireless (appointed by the Competitive Carriers Association); Indra Chalk, T-Mobile (appointed by CTIA); Greg Rogers, Bandwidth (appointed by INCOMPAS); Glenn Clepper, Charter Communications & STI-GA Board Vice-Chair (appointed by NCTA– The Internet & Television Association); Dave Frigen, Wabash Communications (appointed by NTCA – The Rural Broadband Association); Chris Oatway, Verizon (appointed by US Telecom); Gunnar Halley, Microsoft (appointed by the VON Coalition); Michael Starkey, QSI Consulting, Inc. (appointed by Western Telecommunications Alliance/Texatel); Linda Vandeloop, AT&T & STI-GA Board Chair (founding member); Tim Kagele, Comcast (founding member); and Darah Franklin, Google (at-large member).

³ *Report and Order and Further Notice of Proposed Rulemaking*, WC Docket Nos. 17-97, 20-67 (released March 31, 2020), ¶56.

⁴ *Id.*

⁵ *Second Report and Order*, WC Docket Nos. 17-97 (released October 1, 2020), ¶--, n. 181.

⁶ *Second FNPRM*, ¶10.

that, while it continues to refrain from unduly intruding upon the private STIR/SHAKEN governance structure, it is important for the Commission to be able to review the token revocation decisions as these will have the effect of placing the provider out of compliance with the Commission's rules.⁷ The STI-GA Board supports this approach and welcomes the Commission's review of SPC token revocation decisions. From the very beginning of the Governance Authority, it was acknowledged that the Governance Authority would require Commission support in certain areas. Given the impact token revocation decisions will have on providers' abilities to comply with the Commission's call authentication rules, it is appropriate that the Commission should have a role in reviewing these decisions.

The STI-GA Board further urges the Commission to ensure that its reviews are completed in a timely manner. Given the impact that a token revocation would have on a service provider and its customers, it is important that the Commission conclude its review and issue a decision as quickly as reasonably possible.

The Commission also seeks input on the standard of review it should use for STI-GA token revocation decisions.⁸ The STI-GA Board supports the Commission's recommendation that it should perform a *de novo* review of these decisions. The STI-GA Board recognizes the significant impact that its token revocation decisions will have on both service providers and their customers. A *de novo* review will allow the Commission to independently verify the STI-GA Board's decisions and better ensure that the SHAKEN ecosystem continues to operate in a fair and equitable manner.

The *Second FNPRM* also addresses the procedures that must be followed when a provider requests that the Commission review a token revocation decision. These procedures

⁷ *Second FNPRM*, ¶10.

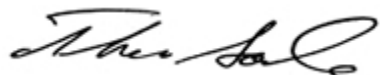
⁸ *Second FNPRM*, 15.

would require, among other things, that the Governance Authority provide certain materials to the Commission upon receipt of a service provider's request for Commission review.⁹ The Commission proposes that these materials would include the STI-GA Board's full record of the SPC token revocation appeal.¹⁰ The STI-GA Board agrees that it should provide all relevant materials to the Commission. These would include the completed SPC token Complaint Submission Form, the notice of complaint that was sent to the STI-GA Board, written responses from the provider at issue, the final written decision of the STI-GA Board, any materials provided by the service provider as part of an appeal of the decision under the STI-GA Operating Procedures, as well as the written decision by the STI-GA Board regarding that appeal. Given the sensitive nature of these materials, including the fact that they may contain confidential provider-specific information, these materials must be protected as confidential and should be presumed confidential by default. Given the essential need to maintain the confidentiality of Board discussions, draft documents and/or Board discussions will not be included in the material provided to the Commission.

III. CONCLUSION

ATIS, on behalf of the STI-GA Board, appreciates the opportunity to provide input to the Commission on this important matter.

Respectfully submitted,



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⁹ *Second FNPRM*, ¶13.

¹⁰ *Second FNPRM*, ¶13.

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