



Federal Communications Commission
Washington, D.C. 20554

December 7, 2017

The Honorable Travis Kavulla
Commissioner,
Montana Public Service Commission
Chair, North American Numbering Council (NANC)
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

Re: Call Authentication Trust Anchor: Selection of Governance Authority and Timely
Deployment

Dear Chairman Kavulla:

As you are aware, the Commission has issued a Notice of Inquiry (NOI) on deploying a call authentication system based on the SHAKEN and STIR standards.¹ Such a system would ensure that many telephone calls can be properly attributed to their callers, increasing the security of the network and reducing the threat of illegal and fraudulent spoofed calls. The continuing need to protect consumers from fraudulent and illegal spoofed calls requires that we deploy a call authentication system as soon as practicable. We seek the recommendations of the NANC on timing and governance of a call authentication system and ask that you refer this matter to the Call Authentication Trust Anchor Issues Working Group for its consideration.

The SHAKEN/STIR standards require a call authentication system to be performed by a Policy Administrator (PA), whose operational rules and standards will be set by a Governance Authority (GA). The standards specify a single GA to set universal, non-discriminatory, and transparent standards for the PA, participating service providers, and other entities using the system.

In the NOI, the Commission sought comment on what entities might serve as the GA. While some commenters think that the Commission could serve in that role, a majority of commenters expressed interest in an industry-led, multi-stakeholder body acting as the GA.² ATIS has suggested that it could constitute the GA.³ We recognize the importance of the governance role for call authentication and we believe that the NANC is well suited to develop criteria for selecting the GA and to evaluate entities applying to serve as the GA. We therefore direct the NANC to:

- Define criteria by which a GA should be selected;
- Apply these criteria in evaluating the suitability of any entities proposing to serve as GA, including ATIS, the Commission, or a working group of the NANC;
- Recommend, if the Commission is not to serve as the GA, the role that the Commission should play in overseeing the administration of the call authentication system; and

¹ *Call Authentication Trust Anchor*, Notice of Inquiry, 32 FCC Rcd 5988 (2017).

² See Comcast Comments at 7-8; ATIS Comments at 7-8; NCTA Comments at 3; iconectiv Comments at 6-7; CTIA Reply at 5-7.

³ ATIS *Ex Parte* at 2.


- Recommend the process by which the PA should be selected, including whether solely by the GA, or by a process including other stakeholders.

In the NOI, the Commission sought comment on how to encourage widespread participation in a call authentication system. Recently the Alliance for Telecommunications Industry Solutions (ATIS) and the SIP Forum have continued their development of the standards; and service providers, potential vendors, and others have made marked progress in testing their use and implementation.⁴ We are encouraged by this continued progress of stakeholders and the ATIS/SIP Forum. For a call authentication system to effectively and reliably authenticate calls, a substantial majority of calls—and thus a significant number of providers—will need to participate in the system. Delays in participation by several service providers, or even one large service provider, can delay the effective deployment of the system. We therefore request recommendations from the NANC to help encourage maximum participation in a timely manner, including:

- A reasonable timeline or set of milestones for adoption and deployment of a SHAKEN/STIR call authentication system, including metrics by which the industry's progress can be measured; and
- Incentives or mandates that the Commission can put in place to ensure that these milestones and timelines are met;
- Any additional steps the Commission needs to take to facilitate deployment of a call authentication system;
- Any steps the Commission or industry might take to make sure a call authentication system works for all participants in the North American Numbering Plan.

We further direct the NANC to approve a written report on its findings on these issues, and to transmit that report to the Wireline Competition Bureau (Bureau) within four months of the date of this letter. If you have questions about the Bureau's referral, please contact Marilyn Jones, the NANC's Designated Federal Officer, by telephone at (202) 418-2357, or by email at marilyn.jones@fcc.gov. In the meantime, thank you for your commitment to ensuring the security and integrity of the telephone network, and your work to safeguard tomorrow's consumers from fraud and deception.

Sincerely,



Kris Anne Monteith
Chief
Wireline Competition Bureau, FCC

⁴ Erratum from Thomas Goode, General Counsel, ATIS, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97, Attach. at 5-6 (filed Nov. 13, 2017) (ATIS *Ex Parte*); ATIS Comments at 2, 4; Letter from Richard Shockey, Principal, Shockey Consulting, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97, Attach. at 2-3, 7; CenturyLink Reply at 2; Letter from Richard L. Fruchterman III, Senior External Affairs Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97, Attach. at 4 (filed Sept. 11, 2017).



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WB
10 day deadline?

Re: Nationwide Number Portability

Dear Chairman Kavulla:

As you are aware, the Commission has issued a Notice of Inquiry (NOI) and Notice of Proposed Rulemaking (NPRM) seeking to remove barriers to a nationwide number portability (NNP) system. The NOI/NPRM builds upon the much-appreciated prior work of the NANC¹ and the Alliance for Telecommunications Industry Solutions (ATIS).² It seeks comment on the best ways that the industry, the Commission, and other stakeholders can develop a number portability system that allows numbers to be ported from anywhere in the country to anywhere else.

The NOI discusses, in particular, four models for NNP: (1) nationwide implementation of Location Routing Numbers (LRNs); (2) non-geographic LRNs; (3) commercial agreements; and (4) iconectiv's GR-2982-CORE specification. The Bureau is interested in furthering progress towards nationwide number portability via the most promising of these models. With the additional technical background and assessments provided in the ATIS report, we believe that the NANC – in particular, the Nationwide Number Portability Issues Working Group – is well-suited to refine and develop recommendations for achieving this goal. Thus, we direct the NANC to:

- Determine whether any of the four models discussed in the NOI are preferable to others in terms of feasibility, cost, and adaptability to changing markets and technologies;
- Specify in detail the potential costs, benefits, and barriers to implementing each of these proposals;
- Identify any likely consequences of these proposals for routing, interconnection, or public safety;
- Recommend next steps to advance full nationwide number portability; and
- Make any other recommendations it deems necessary to achieve this goal.

We further direct the NANC to approve a written report on its findings on these issues, and to transmit that report to the Wireline Competition Bureau (Bureau) within four months of the date of this letter. If you have questions about the Bureau's referral, please contact Marilyn Jones, the NANC's Designated Federal Officer, by telephone at (202) 418-2357, or by email at marilyn.jones@fcc.gov.

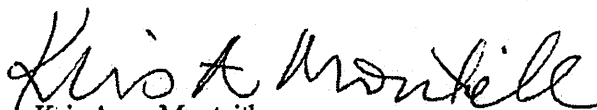
April 1

¹ North American Numbering Council, Local Number Portability Administration Working Group, *White Paper on Non-Geographic Number Portability* (August 30, 2016).

² Alliance for Telecomm. Indus. Sols., *ATIS Standard – ATIS-1000071, Technical Report on a Nationwide Number Portability Study*, (2016).

In the meantime, thank you for your ongoing work to encourage a competitive and efficient number portability system that benefits consumers and all providers.

Sincerely,

A handwritten signature in black ink that reads "Kris A Monteith". The signature is written in a cursive style with a large initial "K" and "M".

Kris Anne Monteith

Chief

Wireline Competition Bureau, FCC