

**Before the
Federal Communications Commission
Washington, D.C. 20544**

In the Matter of the Wireline Competition)
Bureau's Invitation for Comment on)
Caller ID Authentication Best Practices) WC Docket No. 20-324
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**Comment of Professional Association for Customer Engagement
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Michele A. Shuster, Esq.
Joshua O. Stevens, Esq.
Mac Murray & Shuster LLP
6525 West Campus Oval, Suite 210
New Albany, Ohio 43054

***Counsel for Professional Association for
Customer Engagement***

I. Introduction

The Professional Association for Customer Engagement (“PACE”)¹ submits these comments in response to the Wireline Competition Bureau’s (“Bureau”) request for comment on caller ID authentication best practices proposed in a recent report by the North American Numbering Council’s Call Authentication Trust Anchor Working Group (“NANC Report” or “Report”)². PACE generally supports best practices for caller ID authentication to promote trust in the calling ecosystem especially when those best practices encourage creative solutions to the “enterprise problem” of caller ID authentication. However, PACE cautions that the best practices offered in the NANC Report should not be imposed as regulatory mandates because they would inhibit flexible development and deployment of caller ID authentication frameworks needed to stay ahead of bad actors and solve novel issues.

II. Analysis

PACE raised on prior occasions the “enterprise problem” of caller ID authentication.³ The enterprise problem occurs under STIR/SHAKEN authentication primarily in two scenarios. First, the caller may have acquired the telephone number presented in the SIP identity header from a carrier other than the originating carrier. Second, the telephone number presented may have been acquired by the enterprise caller’s client. In both scenarios, the originating service provider would not be able to easily validate the caller’s right to use the number and would likely assign a “B” level attestation to the call.

The NANC Report acknowledges this problem and notes several technological solutions being investigated for resolution including “Delegate Certificates, Letters of Authorization, and

¹ PACE is the only non-profit organization dedicated exclusively to the advancement of companies that use a multichannel contact center approach to engage their customers, both business-to-business and business-to-consumer. These channels include telephone, email, chat, social media, web and text. Our membership is made up of Fortune 500 companies, contact centers, BPOs, economic development organizations and technology suppliers that enable companies to contact or enhance contact with their customers.

² *Best Practices for the Implementation of Call Authentication Frameworks*, NANC Call Authentication Trust Anchor Working Group (approved September 24, 2020).

³ Comment of Professional Association for Customer Engagement, *In the Matters of Call Authentication Trust Anchor and Implementation of TRACED Act Section 6(a) Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket No. 17-97, WC Docket No. 20-67 (filed May 12, 2020); Professional Association for Customer Engagement, Notice of *Ex-Parte* Communication, *In the Matters of Advanced Methods to Target and Eliminate Unlawful Robocalls and Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97 (filed February 7, 2020)

Central Database methods.”⁴ However, all of these solutions, and NANC’s recommendations, hinge upon the service provider’s ability to vet the identity of the subscriber and validate the subscriber’s right to use the telephone numbers presented. NANC acknowledges that a third party may be used to vet and validate and that “third-party vetting services may be particularly useful in the case of enterprise customers that acquire telephone numbers from multiple telephone number service providers.”⁵ PACE agrees that third-party vetting services may be useful but only if a robust market for third-party vetting services exists that allows each service to vet the enterprise on behalf of many voice service providers. If an enterprise is required to work with each voice service provider’s captive third-party vetting service, then the enterprise gains no efficiency (and likely pays additional costs) compared to working with each voice service provider directly. Additionally, use of a third-party vetting service should be optional to the caller. Callers should retain the option to be vetted by and validate its use telephone numbers directly with each of its originating service providers.

In the context of enterprises who call on behalf of numerous clients, such enterprises may utilize thousands of telephone numbers provided by many clients. Requiring individual number vetting of each client would be time intensive and prohibitively expensive. Instead, enterprises should be able to validate their use of client telephone numbers, and receive a full “A” level attestation under STIR/SHAKEN, by demonstrating that it has contract provisions in place with its clients allowing use of the reported numbers and has implemented policies and procedures to cease using such numbers if the client revokes its authorization.

The NANC Report also leaves open a number of fundamental questions. For example, the Report states that a voice service provider should conduct monitoring of traffic for behaviors that are consistent with illegal robocalling and, after further investigation, take appropriate action to address such behaviors.⁶ The Report does not, however, explain in any detail the types of behavior that are consistent with illegal robocalling, expectations for how such traffic should be monitored, or components of an effective investigation. Likely, these questions are left open both to prevent communicating strategies that may assist illegal callers but also because they will vary

⁴ NANC Report at 12.

⁵ NANC Report at 5.

⁶ NANC Report at 5.

greatly from one service provider to the next. Additionally, the Report does not make specific recommendations for vetting and validation procedures. Standardization, or at least partial standardization, of these processes across the industry could be beneficial in reducing inefficiency and burden on callers.

Lastly, NANC indicates that it intends the Report to be a set of best practices and that its recommendations should not be mandated.⁷ PACE agrees. As discussed above, the Report leaves open many questions still to be solved and sets forth frameworks that, while informative, are not operationally specific enough for implementation. Voice service providers and callers should be given the flexibility to work together to create processes and systems that best fit their needs which will vary across relationships and across time.

III. Conclusion

PACE applauds the work of NANC on this Report and encourages the Commission to adopt its recommendations with the express acknowledgement that they should be seen as best practices – not mandates – and should serve as inspiration to the industry as it seeks to find optimal solutions to caller ID authentication.

Respectfully submitted,



Michele A. Shuster, Esq.
Joshua O. Stevens, Esq.
Mac Murray & Shuster LLP
6525 West Campus Oval, Suite 210
New Albany, Ohio 43054
Telephone: (614) 939-9955
Facsimile: (614) 939-9954

⁷ NANC Report at 4.