

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of )  
 )  
Wireline Competition Bureau Invites Comment ) WC Docket No. 20-324  
on Caller ID Authentication Best Practices )  
 )

**COMMENTS OF  
NCTA – THE INTERNET & TELEVISION ASSOCIATION**

NCTA – The Internet & Television Association (NCTA)<sup>1</sup> submits these comments in response to the Public Notice seeking comment on the North American Numbering Council (NANC) report recommending best practices related to caller ID authentication (Best Practices Report).<sup>2</sup> To further Congress and the Commission’s goal of combatting illegal robocalls, the Commission should adopt the voluntary best practices contained in the Best Practices Report.

The TRACED Act requires that the Commission “issue best practices that providers of voice service may use as part of the implementation of effective call authentication frameworks . . . to take steps to ensure the calling party is accurately identified.”<sup>3</sup> In February of this year, the Wireline Competition Bureau wisely tasked the NANC Call Authentication Trust Anchor

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<sup>1</sup> NCTA is the principal trade association of the cable television industry in the United States, which is a leading provider of residential broadband service to U.S. households. Its members include owners and operators of cable television systems serving nearly 80 percent of the nation’s cable television customers, as well as more than 200 cable program networks. Cable service providers have invested more than \$290 billion over the last two decades to deploy and continually upgrade networks and other infrastructure—including building some of the nation’s largest Wi-Fi networks

<sup>2</sup> *Wireline Competition Bureau Invites Comment on Caller ID Authentication Best Practices*, Public Notice, WC Docket No. 20-324. DA 20-1154 (rel. Oct. 1, 2020) (“Public Notice”); Call Authentication Trust Anchor Working Grp., N. Am. Numbering Council, *Best Practices for the Implementation of Call Authentication Frameworks* (2020) (“NANC Best Practices Report”), <http://nanc-chair.org/docs/CATAWGReport-August2020DRAFT.pdf>.

<sup>3</sup> Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, § 4(b)(7), 133 Stat. 3274, 3280 (2019) (TRACED Act); Public Notice at 1.

(CATA) Working Group with recommending best practices that, if adopted by the Commission, would satisfy this requirement.

As the Bureau recognized, the CATA Working Group is particularly well suited to developing such best practices.<sup>4</sup> The CATA Working Group has been deeply involved in establishing the STIR/SHAKEN call authentication framework,<sup>5</sup> and its membership consists of industry representatives – including NCTA members – who are committed to reducing illegal and unwanted robocalls.<sup>6</sup> The Best Practices Report is the result of the working group’s expertise and thoughtful, deliberative efforts. Each of the recommended voluntary best practices – which together address (i) caller identity vetting; (ii) telephone number validation; (iii) SHAKEN attestation levels; (v) third-party validation services; (vi) international call originators; and (vii) robocall mitigation programs – reflects industry consensus on caller ID authentication practices that may help curb illegal robocalls when appropriately incorporated into a voice provider’s operations. NCTA therefore agrees that the Commission should swiftly adopt these recommended voluntary practices.

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<sup>4</sup> Letter from Kris Anne Monteith, Chief, Wireline Competition Bureau, FCC, to Jennifer K. McKee, Chair, NANC, at 1 (Feb. 27, 2020), <https://docs.fcc.gov/public/attachments/DOC-362809A1.pdf>.

<sup>5</sup> *See, e.g.*, Call Authentication Trust Anchor Working Grp., N. Am. Numbering Council, *Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR* (2018), [http://nanc-chair.org/docs/mtg\\_docs/May\\_18\\_Call\\_Authentication\\_Trust\\_Anchor\\_NANC\\_Final\\_Report.pdf](http://nanc-chair.org/docs/mtg_docs/May_18_Call_Authentication_Trust_Anchor_NANC_Final_Report.pdf) (detailing recommendations to quickly establish a Governance Authority for implementing the SHAKEN/STIR framework).

<sup>6</sup> *See, e.g.*, Comments of NCTA – The Internet & Television Association, CG Docket No. 17-59, WC Docket No. 17-97, at 1-3 (filed Jan. 29, 2020) (detailing NCTA members’ call blocking programs and tools and their history of leadership regarding caller ID authentication).

Respectfully submitted,

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