

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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

COMMENTS OF CTIA

CTIA¹ submits these comments in response to the Wireline Competition Bureau’s Public Notice² seeking comment on the North American Numbering Council (“NANC”) Report recommending best practices on caller identification (“caller ID”) authentication (“NANC Report”),³ pursuant to the TRACED Act’s directive for the Federal Communications Commission (“FCC or Commission”) to issue caller ID authentication best practices.⁴ CTIA supports the NANC Report and urges the Commission to issue the best practices in that Report to implement Section 4 of the TRACED Act.

CTIA and its member companies support the Commission’s continued efforts to

¹ CTIA – The Wireless Association[®] (“CTIA”) (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

² *Wireline Competition Bureau Invites Comment on Caller ID Authentication Best Practices*, Public Notice, DA 20-1154, WC Docket No. 20-324 (rel. Oct. 1, 2020) (“*Public Notice*”).

³ Call Authentication Trust Anchor Working Grp., N. Am. Numbering Council, Best Practices for the Implementation of Call Authentication Frameworks (2020), <http://nanc-chair.org/docs/CATAWGReport-August2020DRAFT.pdf> (“*NANC Report*”).

⁴ See Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, S.151, 116th Cong., at § 4(b)(7) (2019) (“*TRACED Act*”).

implement the TRACED Act and to promote the development and deployment of call authentication solutions to help protect consumers from illegal and unwanted robocalls. Consistent with these priorities, the wireless industry has led the way in developing and implementing innovative call authentication tools, such as STIR/SHAKEN, alongside other robocall mitigation tools.⁵ And wireless providers continue to enhance call authentication services and deploy new solutions to further these efforts.⁶

To help ensure that call authentication frameworks are optimized to empower and protect consumers, Congress directed the Commission to 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.”⁷ To fulfill its directive under the TRACED Act, the Commission called upon the NANC, through its Call Authentication Trust

⁵ See, e.g., Comments of CTIA, WC Docket Nos. 17-97, 20-67, at 4-6, 7-8 (filed May 15, 2020); Comments of AT&T, WC Docket Nos. 17-97, 20-67, at 2 (filed May 15, 2020); Comments of T-Mobile, WC Docket Nos. 17-97, 20-67, at 1-3, 12-14 (filed May 15, 2020); Comments of Verizon, WC Docket Nos. 17-95, 17-97, 20-67, at 4-6, 1 (filed May 15, 2020); see also *Call Blocking Tools Now Substantially Available to Consumers: Report on Call Blocking*, Report, CG Docket No. 17-59, ¶¶ 21-26, 30, 33, 35-39 (rel. June 25, 2020) (detailing the availability of call-blocking solutions to consumers) (“*FCC Call Blocking Report*”).

⁶ See e.g. *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97, 20-67 ¶15 (rel. Sept. 30, 2020); Linda Vandeloop, AT&T AVP-Federal Regulatory, *Fighting COVID-19 Scam Robocalls*, AT&T Public Policy (May 15, 2020), <https://www.attpublicpolicy.com/robocalls/fighting-covid-19-scam-robocalls/>; *T-Mobile Unveils Latest Un-Carrier Move: Scam Shield – A Massive Set of Free Solutions to Protect Customers from Rampant Scams and Robocalls*, T-Mobile (July 16, 2020), <https://www.t-mobile.com/news/un-carrier/scam-shield-protects-customers-from-scams-robocalls/>; *Verizon Helps Customers Avoid Nearly 6 Billion to Date; Leads Industry in Robocall Protection*, Verizon (July 16, 2020), <https://www.verizon.com/about/news/verizon-leads-industry-robocall-protection>; see also *FCC Call Blocking Report* ¶ 70 (listing voice service providers that had upgraded their networks and were exchanging signed traffic by the end of 2019).

⁷ *TRACED Act* § 4(b)(7).

Anchor (“CATA”) Working Group (“WG”),⁸ to recommend best practices to address (1) subscriber vetting; (2) telephone number validation; (3) A-level attestation; (4) B- and C-level attestation; (5) third-party validation services; (6) international call originators; and (7) ongoing robocall mitigation programs.⁹ The NANC CATA WG recommended best practices related to each of these areas, which were approved by the full NANC earlier this year.¹⁰

CTIA supports the NANC Report, and encourages the Commission to issue the call authentication best practices therein without modification. By issuing these best practices, the Commission can encourage voice service providers to achieve the TRACED Act’s goal of ensuring the calling party is accurately identified.¹¹ For example, the NANC Report provides recommendations for voice service providers to consider using for subscriber vetting and telephone number validation to complement the implementation of the STIR/SHAKEN framework. By recommending various approaches voice service providers can use to complement and improve their tools to authenticate the identity of calling parties and customers, these recommendations will help protect the voice network from being used by bad actors to place illegal robocalls and enhance information that voice service providers and their analytics partners use for call treatment further down the call path.

⁸ Letter from Kris Anne Monteith, Chief, Wireline Competition Bureau, FCC, to Jennifer K. McKee, Chair, NANC (Feb. 27, 2020), <https://docs.fcc.gov/public/attachments/DOC-362809A1.pdf>. The North American Numbering Council (NANC) is a Federal Advisory Committee that was created to advise the Commission on numbering issues and to make recommendations that foster efficient and impartial number administration. *See North American Numbering Council*, FCC, <https://www.fcc.gov/about-fcc/advisory-committees/general/north-american-numbering-council> (last visited Oct. 15, 2020).

⁹ *NANC Report* at 4-5.

¹⁰ *See North American Numbering Council Meeting, Livestream*, FCC (Sept. 25, 2020, 9:30 AM EDT), <https://www.fcc.gov/news-events/events/2020/09/north-american-numbering-council-meeting>.

¹¹ *See Public Notice* at 1.

The NANC Report also promotes the establishment of ongoing robocall mitigation programs for Internet Protocol (“IP”) and legacy non-IP-based networks, with elements that may vary depending on what best meets the needs of a given provider’s network capabilities. As the Commission recently found, such flexible robocall mitigation programs will “allow[] voice service providers to innovate” and “draw from the growing diversity and sophistication of anti-robocall tools and approaches available.”¹² Likewise recognizing the ever-changing robocall landscape, the NANC Report best practices provide appropriate flexibility to encourage providers to innovate and to address the various challenges of applying innovative call authentication solutions to legacy voice calling services and to a wide range of use cases.¹³ In addition, the best practices were developed based on input from, and collaboration and deliberation among, a diverse group of industry stakeholders, each of which contributed expertise and experience with mitigating illegal and unwanted robocalls and developing call authentication solutions that help protect and empower consumers.¹⁴

For these reasons, CTIA and its member companies support the issuance of the best practices in the NANC Report, as Congress directed in the TRACED Act. By issuing these best practices, the Commission will encourage greater use of call authentication solutions that will benefit consumers in the evolving and ongoing fight against illegal and unwanted robocalls.

¹² *Call Authentication Trust Anchor*, Second Report and Order, WC Docket No. 17-97, ¶ 76 (Oct. 1, 2020) (citation and internal quotation marks omitted).

¹³ *NANC Report* at 4 (explaining the best practices “are considered voluntary and do not imply mandatory implementation, nor should they be mandated, to ensure carriers have the flexibility and speed to respond to evolving issues”); *see id.* (“[A]s the industry’s technical working groups advance new robocall mitigation techniques, and if bad actors find ways to subvert current mitigation techniques, best practices must continue to evolve.”).

¹⁴ *See id.*

Respectfully submitted,

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