

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

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

**COMMENTS OF
USTELECOM – THE BROADBAND ASSOCIATION**

USTelecom – The Broadband Association (“USTelecom”)¹ submits these comments in response to the Wireline Competition Bureau’s Public Notice on the North American Numbering Council (“NANC”) Report recommending best practices related to caller ID authentication.²

USTelecom leads the Industry Traceback Group (“ITG”), a collaborative effort of companies across the wireline, wireless, VoIP and cable industries actively working to trace and identify the source of illegal robocalls.³ Through the vantage point of the ITG, USTelecom witnesses first-hand some service providers’ failures to implement practices that would ensure that they can trust their customers and the information provided to them, as well as mitigate ongoing illegal robocall traffic when they become aware of it. Based on that background,

¹ USTelecom is the premier trade association representing service providers and suppliers for the communications industry. USTelecom members provide a full array of services, including broadband, voice, data, and video over wireline and wireless networks. Its diverse membership ranges from international publicly traded corporations to local and regional companies and cooperatives, serving consumers and businesses in every corner of the country.

² *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); 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/CATAWGReportAugust2020DRAFT.pdf> (“NANC Report”).

³ The ITG was designated by the FCC as the official U.S. robocall traceback consortium in July 2020. *See Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)*, Report and Order, 35 FCC Rcd 7886 (EB 2020).

USTelecom wholeheartedly supports the best practices developed by the NANC Call Authentication Trust Anchor (“CATA”) Working Group to ensure that the calling party is accurately identified as part of the call authentication framework.

Indeed, the recommended best practices regarding subscriber vetting, TN validation, third-party validation, international call originators, and ongoing robocall mitigation, if widely adopted where appropriate, will have a substantial impact improving the chain of trust for telephone calls, including those authenticated under STIR/SHAKEN as well as those that are not. The Commission therefore should endorse the best practices as proposed by the NANC,⁴ and should encourage voice service providers to adopt them as appropriate, as well as the other best practices the industry developed in conjunction with the state Attorneys General.⁵

Relatedly, consistent with USTelecom’s prior advocacy,⁶ the NANC CATA Working Group “recommended best practices for a broader robocall mitigation program that apply equally to IP and non-IP networks and services.”⁷ USTelecom agrees with the Working Group’s recommendation. The Commission’s adoption of a robocall mitigation program certification requirement for unsigned traffic is a beneficial step forward,⁸ but USTelecom

⁴ See TRACED Act § 4(b)(7) (directing 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”).

⁵ See NANC Report at 17; Anti-Robocall Principles for Voice Service Providers, *available at* <https://www.ustelecom.org/wp-content/uploads/2019/08/State-AGs-Providers-AntiRobocall-Principles-With-Signatories.pdf>.

⁶ See, e.g., Reply Comments of USTelecom – The Broadband Association, CG Docket No. 17-59, at 10-11 (filed Sept. 29, 2020); Notice of Ex Parte Presentation of USTelecom – The Broadband Association, WC Docket No. 17-97, at 1 (filed Sept. 23, 2020); Notice of Ex Parte Presentation of USTelecom – The Broadband Association, WC Docket No. 17-97, at 2-5 (filed Sept. 18, 2020); Notice of Ex Parte Presentation of USTelecom – The Broadband Association, WC Docket Nos. 17-97 & 20-67, at 1-2 (filed Sept. 1, 2020); Comments of USTelecom – The Broadband Association, CG Docket No. 17-59, at 6-8 (filed Aug. 31, 2020).

⁷ NANC Report at 18.

⁸ *Call Authentication Trust Anchor*, Second Report & Order, WC Docket No. 17-97, FCC 20-136 ¶ 74

believes that the Commission should move quickly to expand the robocall mitigation requirement to all traffic, regardless of whether it is signed, rather than wait for caller ID authentication technology to be more widespread.⁹ As USTelecom has explained, a broad robocall mitigation requirement is critical to restore trust in the telephone network, as it can help to address, for example, when bad actors make illegal robocalls with their own numbers.¹⁰

Respectfully submitted,

By: /s/ Joshua M. Bercu/
Joshua M. Bercu
Vice President, Policy & Advocacy

USTelecom Association
601 New Jersey Avenue, N.W.
Suite 600
Washington, D.C. 20001
(202) 551-0761

October 16, 2020

(rel. Oct. 1, 2020).

⁹ *Contra id.* ¶ 76 (“We will revisit this conclusion if we determine that additional robocall mitigation efforts are necessary in addition to STIR/SHAKEN after the caller ID authentication technology is more widespread.”).

¹⁰ *See* note 6 *supra*.