

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

In the Matter of)	
)	
Protecting Against National Security)	WC Docket No. 18-89
Threats to the Communications Supply)	
Chain Through FCC Programs)	

REPLY COMMENTS OF METASWITCH NETWORKS

Joseph Weeden, VP Product Marketing
11600 Sunrise Valley Drive, Suite 380
Reston, VA 20191
703 480 0527

June 4, 2020

Contents

REPLY COMMENTS OF METASWITCH NETWORKS	3
INTRODUCTION.....	3
THE MECHANISM TO DEVELOP THE LIST OF SUGGESTED REPLACEMENTS SHOULD BE BROADLY ACCESSIBLE TO ALL SUPPLIERS AND LOW OVERHEAD	4
THE REPLACEMENT LIST SHOULD INCLUDE SUPPLIERS OF VIRTUAL NETWORK EQUIPMENT AND SERVICES	5

REPLY COMMENTS OF METASWITCH NETWORKS

Metaswitch Networks hereby responds to the comments on the Public Notice concerning the Commission's implementation of the Secure and Trusted Communications Act.

INTRODUCTION

Founded in 1981, Metaswitch is a recognized leader in the development of high performance, cloud native communications software. Metaswitch's software solutions equip, accelerate and transform communications service and platform providers, worldwide.

Metaswitch develops software products that underpin the service platforms of today and tomorrow. Metaswitch's cloud-native virtual network functions are designed from the ground up to run on commodity hardware in private, public and hybrid clouds. This software powers the voice, data and unified communications services of fixed, mobile and converged operators worldwide, while also acting as the foundation on which incumbent operators and aggressive new entrants are building the cloud-based service platforms of the future.

Metaswitch has proven installations across our customer base which includes 500+ US customers, including the following products.

- VoIP softswitches and gateways
- VoLTE/VoWiFi core
- 5G core
- Voice and VoLTE interconnect
- Session Border Controller
- Unified Communication and Collaboration
- Robocall prevention (STIR / SHAKEN)

THE MECHANISM TO DEVELOP THE LIST OF SUGGESTED REPLACEMENTS SHOULD BE BROADLY ACCESSIBLE TO ALL SUPPLIERS AND LOW OVERHEAD

The Secure and Trusted Communications Act requires the Commission to create a list of suggested alternatives to the equipment provided by the covered companies¹. We note that in the comments there are a variety of suggestions on how that list should be constructed. We also note that several organizations have commented that the Commission's timeline to achieve this is aggressive². This clearly reflects a desire to achieve the goal of protecting national security as soon as possible. Given that

- the Commission is required to make a list,
- service providers are most likely to select equipment from a supplier on the list,
- the aim is to replace the equipment as quickly as possible,

we suggest that these goals can be achieved by providing a straightforward mechanism for suppliers to register themselves and their offered equipment with the Commission, including an assurance from the supplier that it is not re-selling or white-labelling equipment from a covered supplier. Providing a low-overhead mechanism to creating the list enables service providers to procure equipment from suppliers on the list as quickly as possible. Any delay introduced by, for example, additional vetting from the Commission, will directly impact the timeline to replace the equipment as service providers will most likely not want to purchase equipment from a supplier who is not on the list. Furthermore, a vetting step by the Commission would impose additional burdens on the agency in ensuring the list remains neutral, as all entries will need to be vetted equally and in a timely fashion³.

The Act requires the list to either include 'both physical and virtual communications equipment, application and management software' or 'categories of replacements of both physical and virtual communications equipment, application and management software and services'. Metaswitch believes

¹ <https://www.congress.gov/116/plaws/publ124/PLAW-116publ124.pdf>, section 4 d) (1) (A)

² WTA comments:

<https://ecfsapi.fcc.gov/file/1052159036167/WTA%20Section%204%205.20.20%20Comments.pdf>, Ericsson comments:

<https://ecfsapi.fcc.gov/file/1052086253348/Ericsson%20Secure%20Networks%20Act%20Comments.pdf>, RWA comments: <https://ecfsapi.fcc.gov/file/10520164143625/RWA%20Secure%20Networks%20Act%20Section-4%20Comments%20-%20Final%20for%20filing%20with%20FCC%20May%202020%202020.pdf>

³ <https://www.congress.gov/116/plaws/publ124/PLAW-116publ124.pdf>, section 4 d) (1) (B)

listing categories of equipment provided by suppliers will be lower overhead for the Commission when compared to listing individual product name and part numbers. Listing individual product names and part numbers would increase the overhead of the list because service provider networks typically consist of many different components and the list would need to be regularly updated as vendor product names and parts change over time. Maintaining the list at the part level of detail introduces an overhead with no clear benefit as it seems more likely that if in future an organization is added to the list of covered companies, the list would include all the products offered by the organization rather than a single product part. If a part number is inadvertently missing from the list that the vendor had registered with the Commission, then this may cause unnecessary delay in a service provider purchasing to the equipment until the vendor corrects the omission with the Commission. Furthermore, if the above suggestion of allowing companies to register is adopted, then allowing them to register on a 'per category' basis places the burden of ensuring accuracy on the vendors.

THE REPLACEMENT LIST SHOULD INCLUDE SUPPLIERS OF VIRTUAL NETWORK EQUIPMENT AND SERVICES

The Commission asks whether the replacement list should include suppliers of virtual network equipment and services. Several organizations have commented back to say yes⁴. Metaswitch strongly agrees with this. Deploying software-based solutions using open interfaces is an important option to service providers to avoid the security risk of single supplier lock-in, whilst also providing service providers with the broadest selection of vendors to choose from to allow them to build a competitive network for the future.

⁴ E.g. Ericsson comments, Section III:

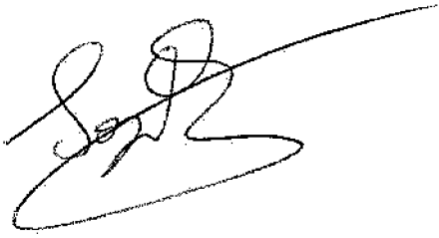
<https://ecfsapi.fcc.gov/file/1052086253348/Ericsson%20Secure%20Networks%20Act%20Comments.pdf>,
CCA comments, Section II

https://ecfsapi.fcc.gov/file/1052029865837/CCA%20Comments%20to%20Secure%20Networks%20Act%20PN_5-20-20.pdf

NetNumber comments, Section III:

[https://ecfsapi.fcc.gov/file/1052070968941/NetNumber%20Supply%20Chain%20Public%20Notice%20Comments%20\(FINAL%205-20-2020\).pdf](https://ecfsapi.fcc.gov/file/1052070968941/NetNumber%20Supply%20Chain%20Public%20Notice%20Comments%20(FINAL%205-20-2020).pdf)

Respectfully Submitted

A handwritten signature in black ink, appearing to be 'Joseph Weeden', written in a cursive style. The signature is positioned below the text 'Respectfully Submitted' and above the name 'Joseph Weeden'.

Joseph Weeden

Metaswitch Networks

June 4, 2020