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July 14, 2017

### VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Advanced Methods To Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59; *Call Authentication Trust Anchor*, WC Docket No. 17-97**

Dear Ms. Dortch:

On July 14, 2017, the undersigned, along with Beth Choroser and Chris Wendt from Comcast Corporation (“Comcast”), met with Kristine Fargotstein from the Office of Chairman Pai regarding the above-referenced proceedings. At the meeting, we applauded the Commission’s ongoing efforts to combat illegal spoofed robocalls. We emphasized that the Commission should focus on facilitating the development and adoption of SHAKEN (Signature-based Handling of Asserted Information Using toKENs) and STIR (Secure Telephone Identity Revisited) authentication standards—including by speeding along the IP transition and adopting a safe harbor for providers that adopt the standards. We noted that the hybrid, centralized governance approach to SHAKEN and STIR described in a recent *ex parte* letter by the Alliance for Telecommunications Industry Solutions (“ATIS”) holds significant promise, and would be inclusive of a wide range of stakeholders.<sup>1</sup> Mr. Wendt then delivered a presentation using the attached slide deck, providing an overview of the SHAKEN and STIR framework and the substantial progress that has been made so far in developing standards and pushing towards implementation.

Additionally, we expressed Comcast’s agreement with proposals to facilitate the ability of voice providers to develop and implement other tools for identifying and blocking illegal spoofed robocalls, including traceback and Do-Not-Originate capabilities. We also emphasized the need to ensure that voice providers have the flexibility to address threats as they evolve, and thus urged the Commission to consider adopting a broader safe harbor that would cover other filtering methodologies and approaches involving as-yet undeveloped technologies. We further noted Comcast’s support of the proposal to establish a safe harbor enabling voice providers to

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<sup>1</sup> See Letter of Thomas Goode, ATIS, to Marlene Dortch, Secretary, FCC, CG Docket No. 17-59 (filed Jun. 30, 2017).

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block illegal spoofed robocalls where the spoofed number is invalid under the North American Numbering Plan. And while the proposals to enable blocking for unallocated and unassigned numbers currently pose some implementation challenges, we noted that there has been some early-stage work by the Internet Engineering Task Force to develop a registry of allocated telephone numbers that could help address some of those challenges.

Please contact the undersigned with any questions regarding these issues.

Respectfully submitted,

*/s/ Matthew T. Murchison*

Matthew T. Murchison  
of LATHAM & WATKINS LLP  
*Counsel for Comcast*

Enclosure

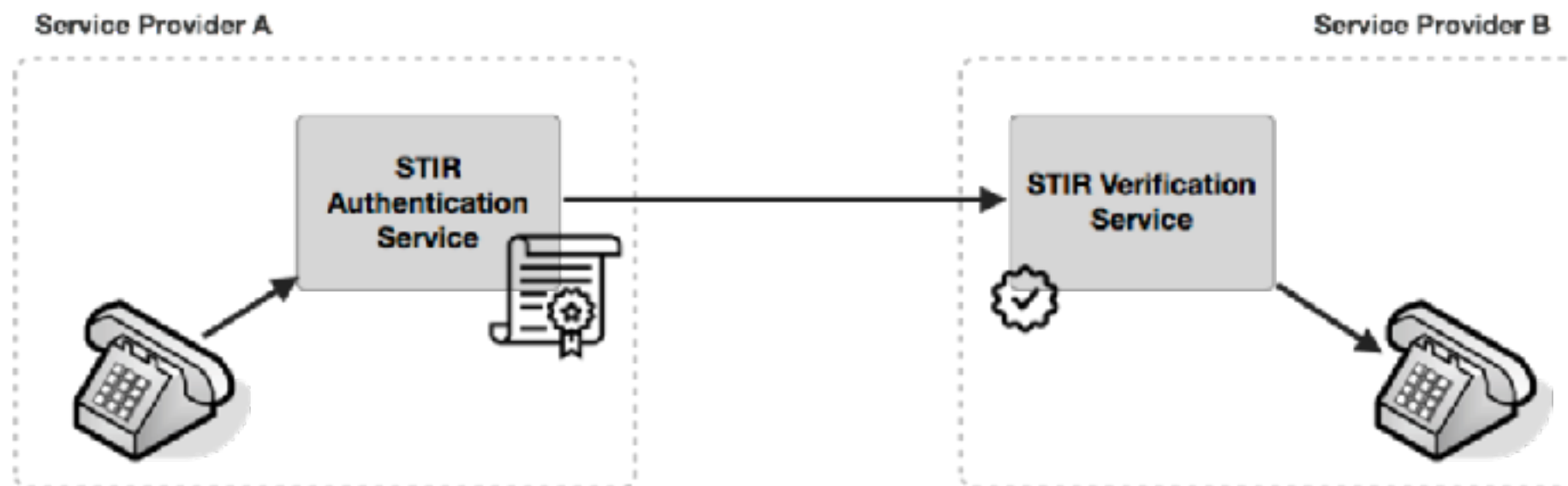
cc: Kristine Fargotstein

# STIR and SHAKEN Framework Overview and Roadmap

Chris Wendt

# STIR/SHAKEN Goals

- Create an industry standard solution for securing the calling identity via Public Key Infrastructure and a Certificate Governance that allows the ability to ensure the VoIP telephone network can set policy around the identification and restriction of bad actors that may be originating illegitimate and fraudulent calls.
- Calling Identity/Telephone Numbers are signed at origination with the Service Provider private key. At termination, the Service Provider certificate is used to validate both the calling identity as well as the validity of the Service Provider that originated the call.



# SHAKEN PASSporT extension- Attestation and Originating Identifier

- **Attestation (attest):**

The service provider will classify the origination of the call into three categories:

- **Full Attestation:** The signing provider:

- is responsible for the origination of the call onto the IP based service provider voice network
    - has a direct authenticated relationship with the customer and can identify the customer
    - has established a verified association with the telephone number used for the call.

- **Partial Attestation:** The signing provider:

- is responsible for the origination of the call onto its IP based voice network
    - has a direct authenticated relationship with the customer and can identify the customer
    - has NOT established a verified association with the telephone number being used for the call

- **Gateway Attestation:** The signing provider:

- is the entry point of the call onto its IP based voice network
    - has no relationship with the initiator of the call (e.g., international gateways).

- **Originating Identifier (origid):**

This is a unique and opaque UUID (RFC4122) that will be used for two reasons

- traceback identification of originator, either service provider, wholesale customer, enterprise
  - can be used by verification and call spam classification/analytics as an opaque identity to associate reputation scores and identify bad actors to authorities for potential follow up

# Do Not Originate Next Steps

- As discussed in the Strike Force, Do Not Originate is an important way of controlling the illegitimate use of telephone number spoofing using telephone numbers that are either unallocated or not authorized to be used.
- Currently, we have a manual method in place as a result of the Strike Force of identifying target numbers, however telephone number allocation and ownership is dynamic and changes from day to day.
- In the modern IETF working group, we are at the initial stages of defining a new framework for telephone number allocation management and a distributed registry for real-time updates to the list of allocated or unallocated telephone numbers. The goal is to have an easily accessible up to date list of numbers that can be used for Do Not Originate.
- draft-wendt-modern-drip-02 and draft-peterson-modern-ter-valid-00 are the relevant early stage documents