July 20, 2018

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

<div align="center">

Re: Comment for report on robocalling
CC Docket No. 17-59

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Dear Ms. Dortch,

I am submitting the following information in response to the Consumer and Governmental Affairs Bureau's request, dated June 20, 2018, for input for a staff report on robocalling. In particular, we have information to share in response to this question:

> *"Industry has made progress toward a standardized system for caller ID authentication, namely SHAKEN/STIR, to address the caller ID spoofing that is frequently used with illegal robocalls. How is that effort progressing and when will it result in consumer benefits?"*

TransNexus is a developer of software products used by telecommunications service providers. We've developed software to provide SHAKEN/STIR capabilities and are working with telecommunications service providers to deploy this capability. Here are our observations about recent progress toward this goal.

1. FCC Chairman Pai's acceptance of the *Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR* by the NANC Call Authentication Trust Anchor Working Group seems to have been a turning point in generating interest and activity among telecommunications service providers. Since then, we've been receiving more inquiries from companies that want to get moving toward planning, testing and deployment. Though we don't work directly with consumers, we're also receiving more calls from them asking about SHAKEN/STIR.

2. The ATIS Robocalling Testbed has been helpful to us in developing SHAKEN/STIR capabilities in our software and to our customers in testing the operation of this software within their telecommunications networks.

3. One of our customers, a telecommunications service provider, has deployed SHAKEN/STIR functionality within their production network. They've completed the ATIS tests and additional test plans. They're seeking other telecommunications service providers to exchange calls that they will authenticate and sign (outbound) and verify (inbound). They view this capability as a powerful market differentiator to attract customers who will value relief from unwanted robocalls while the service providers benefit from increased call completion rates.

4. Consumers could see immediate benefits with calls involving carriers who've made SHAKEN/STIR interop trust arrangements. Widespread benefits will be realized with broad participation by carriers and the initiation of trust anchor functions.

Respectfully submitted,

Jim Dalton
CEO, TransNexus