

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

In the Matter of

Call Authentication Trust Anchor

WC Docket No. 17-97

REPLY COMMENTS OF NEUSTAR, INC.

Neustar, Inc. (“Neustar”) hereby submits the following reply comments to address a discrete but important issue raised in the *Call Authentication NOI* – specifically, the appropriate governance authority and policy administration structure to oversee implementation of the Secure Telephone Identity Revisited (“STIR”) and Signature-based Handling of Asserted information using toKENs (“SHAKEN”) framework.¹

There is uniform consensus among commenters that robocalling is a significant problem and that the STIR/SHAKEN framework is an important tool to help mitigate that problem.² For

¹ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Notice of Inquiry, FCC 17-89 (“*Call Authentication NOI*”).

² See Comments of American Cable Association, WC Docket No. 17-97, at 1-2 (Aug. 14, 2017) (noting the “growing problem of illegal robocalling” and that “the SHAKEN/STIR call authentication framework could serve as the foundation for an effective industry-led partial solution to the problem of illegal robocalls.”); Comments of Comcast Corporation, WC Docket No. 17-97, at 2 (Aug. 14, 2017) (stating that the STIR/SHAKEN “framework currently represents the most promising way of addressing illegal spoofed robocalls in a comprehensive and robust manner”); Comments of NCTA – The Internet & Television Association, WC Docket No. 17-97, at 1 (Aug. 14, 2017) (“The SHAKEN/STIR framework shows real promise in becoming a useful tool to help consumers block unwanted calls.”); Comments of Noble Systems Corporation, WC Docket No. 17-97, at 1 (Aug. 14, 2017) (noting that STIR/SHAKEN “approach is the long term solution for combating illegal calls”).

the benefits of this framework to be realized, however, STIR/SHAKEN must be widely deployed, and such deployment must occur sooner rather than later.³

To expedite STIR/SHAKEN deployment, Neustar proposed in its initial comments that the Commission rely upon existing governance authority and policy administration models. Specifically, Neustar proposed: (1) creating a new subcommittee of the North American Numbering Council (“NANC”) to serve as the Secure Telephone Identity – Governance Authority (“STI-GA”) for the STIR/SHAKEN framework; and (2) tasking the Pooling Administrator (“PA”) to serve as the STIR/SHAKEN Secure Telephone Identity Policy Administrator (“STI-PA”).⁴ The Commission should adopt Neustar’s proposal and continue its leadership position in combatting robocalling by taking a direct role in the creation of the STIR/SHAKEN oversight regime.

Utilizing the NANC and the PA to perform the STI-GA and STI-PA functions has three distinct advantages. First, Neustar believes that its proposal offers the fastest path to implementation of the recently published STIR/SHAKEN governance and certificate management requirements necessary for the industry to accelerate network deployment. Second, the FCC already has direct oversight of both the NANC and the PA, which allows the Commission to participate in the implementation and to ensure the broadest representation of stakeholders. Third, this is an established model used for other critical national numbering services such as North American Numbering Plan Administration and Pooling Administration.

³ See Comments of Transaction Network Services, WC Docket No. 17-97, at 7 (Aug. 14, 2017); (noting that “all are in agreement about the urgency of a solution to the robocall problem”); *see also* Comments of CTIA, WC Docket No. 17-97, at 9 (Aug. 14, 2017) (“The FCC should support . . . and promote rapid deployment”).

⁴ Comments of Neustar, Inc., WC Docket No. 17-97, at 5-7 (Aug. 14, 2017).

The role of the STI-GA is to govern policies and procedures around the acquisition and issuance of certificates. Neustar expects that the STI-GA would build on the work already done at ATIS and the IETF, refining it for deployment and managing changes on an ongoing basis. In addition, the STI-GA could advise the FCC on other technical issues regarding the threats posed by robocalling and telephone number spoofing.

These functions are similar to those performed by existing NANC subcommittees.⁵ In addition, a NANC subcommittee could have broad representation from multiple segments of the industry, which is often not the case with other industry committees that tend to be controlled by a limited number of industry players.

The role of the STI-PA is to: (1) determine which entities or companies are authorized to request certificates; (2) determine which Certification Authorities (“CAs”) are authorized to issue certificates; and (3) operate Public Key Infrastructure (“PKI”) for digitally signing tokens for service providers and validating signatures for CAs. The PA is ideally situated to perform these functions.

Because determining which entities are authorized to receive numbering resources is a current role of the PA, the STI-PA for STIR/SHAKEN is a natural extension of this role. Further, Neustar, the current PA, has extensive experience operating PKI for the NPAC and multiple top level domain registries such as .us. Neustar also has already developed a standards-based STIR/SHAKEN software implementation, exclusively operates the ATIS Robocalling Testbed using this implementation, and has an automated STIR/SHAKEN certificate

⁵ Such subcommittees include, for example, the Local Number Portability Administration Working Group and the Numbering Oversight Working Group.

management system prototype. Furthermore, Neustar could assume these STI-PA functions quickly because the FCC's existing PA contract permits the addition of such functions.⁶

In summary, Neustar reaffirms its proposal to employ a hybrid STIR/SHAKEN governance approach that utilizes the NANC and PA to most quickly allow the industry and consumers alike to start realizing the benefits of caller authentication standards.

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Respectfully submitted,

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⁶ The PA contract will be subject to an RFP in the near future, which would give the FCC and the industry the opportunity to decide whether the STI-PA functions should properly be included in the role of the PA or should be transitioned to a different entity.