

**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 CENTURYLINK**

**I. INTRODUCTION**

CenturyLink<sup>1</sup> files these reply comments in response to the Notice of Inquiry (“NOI”) released July 14, 2017 in the above-referenced docket.<sup>2</sup> CenturyLink appreciates the FCC’s continued focus on means to combat illegal robocalls that rely on spoofed caller ID information. As noted in the NOI and in initial comments in this proceeding that through ATIS, the SIP Forum and the Internet Engineering Task Force, the industry is making substantial progress on developing a call authentication solution under the SHAKEN/STIR framework. CenturyLink agrees with those commenters urging the FCC to support this ongoing work and encouraging it to continue as it represents the most promising call authentication solution to address illegal robocalls containing spoofed caller ID information. The FCC’s efforts are better focused on areas such as education, enforcement, and coordination with international counterparts. As observed by many commenting parties, proceeding in this manner should provide the best opportunity for expeditious development and deployment of a call authentication solution while also addressing many of the other contributors to the illegal robocalling problem.

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<sup>1</sup> These comments are filed by and on behalf of CenturyLink, Inc. and its subsidiaries.

<sup>2</sup> *Call Authentication Trust Anchor*, WC Docket No. 17-97, Notice of Inquiry, FCC 17-89 (rel. July 14, 2017).

## **II. A FLEXIBLE, INDUSTRY-DRIVEN APPROACH WILL BEST PROMOTE TIMELY DEVELOPMENT AND DEPLOYMENT OF AN EFFECTIVE AUTHENTICATION SOLUTION**

Given the widespread annoyance and harm illegal robocalling causes consumers, it is appropriate for the FCC to investigate what it should be doing to promote an authentication framework as part of a multi-faceted solution to this problem. As the record shows, important work is well underway with important milestones slated for near-term completion. ATIS described work “within [its] Packet Technologies and Systems Committee (PTSC) and the ATIS/SIP Forum IP-NNI Task Force to identify deployment metrics, best practices for SHAKEN deployment, and operational and management considerations for SHAKEN STI Certification Authorities that [is] expected to be completed by the end of 2017.”<sup>3</sup> As CTIA states, “[a]n industry body is the best way to convene the various stakeholders to develop standards. The industry has technical expertise, experience developing consensus-based standards, and is on the front line dealing with robocalls.”<sup>4</sup> Moreover, standards are easier to modify than administrative rules.<sup>5</sup> Given the industry’s substantial ongoing progress, and the industry’s ability to be more nimble and responsive to address evolving elements of illegal robocalling, the industry should continue this important work without regulatory constraint.

While CenturyLink understands the NOI questioning whether there are viable alternatives to SHAKEN,<sup>6</sup> CenturyLink agrees that “SHAKEN and STIR are the only open, standardized mechanisms for call authentication that are supported as practical and deployable by the

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<sup>3</sup> ATIS Comments at 4.

<sup>4</sup> CTIA Comments at 3.

<sup>5</sup> CTIA Comments at 4.

<sup>6</sup> NOI at ¶ 17.

industry.”<sup>7</sup> Further, SHAKEN’s centralized structure is a “more ‘deployable’ and effective approach than one allowing competing, self-certifying systems.”<sup>8</sup> Additionally, the development process is consensus-based and contains broad representation from all industry segments.<sup>9</sup> In fact as one of several IP transition related test cases, ATIS’s Testbed Focus Group has SHAKEN specific testing under way with preliminary initial results. In light of these considerations, the best path forward to an expeditious call authentication solution is to support and promote the ongoing industry work.

Notwithstanding the substantial promise that SHAKEN holds, CenturyLink agrees with those commenters that recommend it be implemented on a flexible, rather than mandatory, basis. This approach has several benefits. While the SHAKEN framework is expected to be very effective at identifying spoofed robocalls in an IP environment, it is a new methodology. It is reasonable to gain additional experience with the methodology before mandating adoption.<sup>10</sup> Making implementation voluntary also helps avoid imposing costs on small carriers, as they will be able to choose whether or not to move forward with deployment.<sup>11</sup> Finally, as the NOI recognizes, market forces are likely to incent providers to implement the framework absent the force of a mandate.<sup>12</sup> Thus, a voluntary approach would certainly encourage wide implementation but avoid some of the drawbacks associated with a mandate. The FCC may consider further proceedings at a later date if adoption rates are below expectations.

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<sup>7</sup> ATIS Comments at 5.

<sup>8</sup> *Id.*

<sup>9</sup> *See, e.g.*, Industry Robocall Strike Force Report, April 28, 2017, at 5.

<sup>10</sup> CTIA Comments at 7.

<sup>11</sup> *See, e.g.*, NTCA Comments at 6.

<sup>12</sup> NOI at ¶ 14 and Comcast Comments at 5.

With respect to the NOI's question about whether entities currently carrying out delegated functions are appropriate to serve the role of policy administrator, CenturyLink agrees with those commenters that observe neither NANPA nor LNPA is a natural fit to fulfill that role.<sup>13</sup> Call authentication is distinct from number administration. CenturyLink favors looking to those entities involved in SHAKEN development to recommend and help assess what entities are best qualified to perform the unique tasks associated with call authentication.<sup>14</sup> CenturyLink supports ATIS's recommendations that an RFP-type process be used to identify the appropriate policy administrator.<sup>15</sup>

The NOI describes ATIS's recommendations for certification authorities and service provider requirements<sup>16</sup> and CenturyLink supports these recommendations. CenturyLink agrees with requiring service providers to have an Operating Company Number ("OCN") to sign calling party information. As CTIA notes, this is a simple and reasonable requirement that has been previously vetted.<sup>17</sup> To address special circumstances, CenturyLink supports ATIS's suggestion to give the governing authority latitude to review where different criteria may be appropriate.<sup>18</sup>

### **III. THERE ARE IMPORTANT ROLES FOR THE FCC WITH RESPECT TO EDUCATION, ENFORCEMENT, AND INTERNATIONAL COORDINATION**

While industry is most appropriately tasked with continuing the technical work needed to finalize the SHAKEN framework, there are important functions for the FCC to help ensure success in the multi-front battle against illegal robocalls. CenturyLink agrees with those

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<sup>13</sup> CTIA Comments at 5; NOI at ¶¶ 21-24.

<sup>14</sup> See CTIA Comments at 6.

<sup>15</sup> ATIS Comments at 11.

<sup>16</sup> NOI at ¶¶ 28-30.

<sup>17</sup> CTIA Comments at 6.

<sup>18</sup> ATIS Comments at 14.

commenters that recognize the unique and specialized role the FCC can play with respect to education, enforcement, and coordination with its international counterparts.

Throughout the initiative to reduce illegal robocalling, education and enforcement have been mentioned countless times as essential pieces of a coordinated attack against illegal robocallers. Here, education will be needed for consumers and the broader industry to understand the benefits of the call authentication framework, and the FCC is ideally situated to help with that effort.<sup>19</sup> Enforcement action by the FCC and other agencies to punish illegal robocallers will remain critical to deter future bad actors.<sup>20</sup> In addition, safe harbor protections will also be important for providers that seek to block calls pursuant to the SHAKEN authentication framework.<sup>21</sup>

CenturyLink wholeheartedly agrees with those commenters that observe that “[e]ffective call authentication will require cooperation with international partners.”<sup>22</sup> Use of call authentication domestically is not only inherently limited because it does not offer protection with respect to international calls,<sup>23</sup> but also presents a risk of shifting more illegal robocalling overseas.<sup>24</sup> The FCC should therefore engage its counterparts abroad and promote international efforts to deploy call authentication solutions to maximize their effectiveness for the benefit of

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<sup>19</sup> Telcordia Comments at 3.

<sup>20</sup> See, e.g., *In the Matter of Best Insurance Contracts, Inc., and Philip Roesel, dba Wilmington Insurance Quotes*, Citation and Order, File No. EB-TCD-16-00023195, DA 17-662 (rel. Aug. 4, 2017).

<sup>21</sup> See, e.g., Comcast Comments at 5.

<sup>22</sup> CTIA Comments at 4.

<sup>23</sup> USTelecom Comments at 3.

<sup>24</sup> CTIA Comments at 9.

consumers.<sup>25</sup> Such leadership, combined with the other substantial industry efforts underway, stands to yield meaningful relief for consumers.

#### **IV. CONCLUSION**

The record shows widespread support for the industry to continue its ongoing work on call authentication without regulatory mandates. The FCC should support these industry efforts while focusing on areas such as education, enforcement, and coordination with international counterparts. Proceeding in this manner harnesses the strengths of industry and the FCC and provides the best opportunity for expeditious, effective solutions to the illegal robocalling problem.

Respectfully submitted,

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<sup>25</sup> See, e.g., CTIA Comments at 8; USTelecom Comments at 3.