# Cloud Communications Alliance

November 12, 2019

**VIA ECFS**
Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE:**   **Notice of Ex Parte Meeting,** In the Matter of *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, and *Call Authentication Trust Anchor*, WC Docket No. 17-97

Dear Ms. Dortch:

On Friday, November 8, 2019, Joe Marion, President, Cloud Communications Alliance ("CCA"); Mark Iannuzzi, President, Telnet Worldwide; Alan Rihm, Chief Executive Officer, CoreDial; Joe Weeden, Vice President, Product Management, Metaswitch; and Michael Pryor, Brownstein Hyatt Farber Shreck, counsel to the CCA, met with Chairman Ajit Pai and Nirali Patel, Wireline Advisor to Chairman Pai.

As indicated in the attached presentation, the purpose of the meeting was to introduce the CCA and, consistent with its previously filed comments, discuss CCA's position on SHAKEN/STIR implementation.[1]  CCA explained that it is the leading voice for the domestic and international cloud communications industry, a rapidly growing segment of the enterprise market.  CCA noted that its member companies were eager to participate in the implementation of SHAKEN/STIR but full participation requires the adoption of standards and protocols for common enterprise calling scenarios that would allow the receipt of the highest level of attestation.  Common enterprise calling scenarios such as multi-home PBXs, working remotely, obtaining telephone numbers from carrier partners or least cost routing could all result in calls being erroneously considered illegitimately spoofed or otherwise denied the highest level of attestation.

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[1] Comments of the Cloud Communications Alliance, CG Docket No. 17-59, WC Docket No. 17-97 (filed June 24, 2019);  Reply Comments of the Cloud Communications Alliance, CG Docket No. 17-59, WC Docket No. 17-97 (filed August 23, 2019).

We explained that industry was currently assessing possible solutions, including certificate delegation and a number registry, that would facilitate A-level attestation for these types of common enterprise calling scenarios.  With respect to certificate delegation, we emphasized that this solution should include the ability of carriers to delegate certificates to other providers, as well as to individual enterprises.  We urged the Commission to push industry to quickly adopt such solutions, or mandate them if necessary.

Pending adoption of such solutions, legitimate enterprise calls could be blocked or mislabeled based on SHAKEN/STIR information.  We thus urged caution in affording broad authority to block calls backed by safe harbors, at least without robust and transparent mechanisms to promptly unblock calls.  The Commission should also reject requests to block all international calls using U.S. numbers.  Finally, we noted the importance of ubiquitous, just and reasonable IP interconnection to ensure end-to-end delivery of SHAKEN/STIR information.

Please contact the undersigned if you have any questions.

Sincerely,

Joe Marion

cc:     Narali Patel (via email)

Attachment.

# CLOUD COMMUNICATIONS ALLIANCE

Meeting with FCC Chairman Ajit Pai, November 8, 2019.

# Who We Are

# Cloud-Based Communications

Industry born from the IP transition and the proliferation of broadband

Approximately 25% of the overall enterprise market

CCA member cloud-based services offer enterprises highly sophisticated, flexible communications services at lower cost (*e.g.,* avoiding the capital expenditure of on-premises equipment).

Target small to medium businesses but increasingly moving to the large enterprise market

Anticipate continued strong growth in the range of 30 to 40 percent
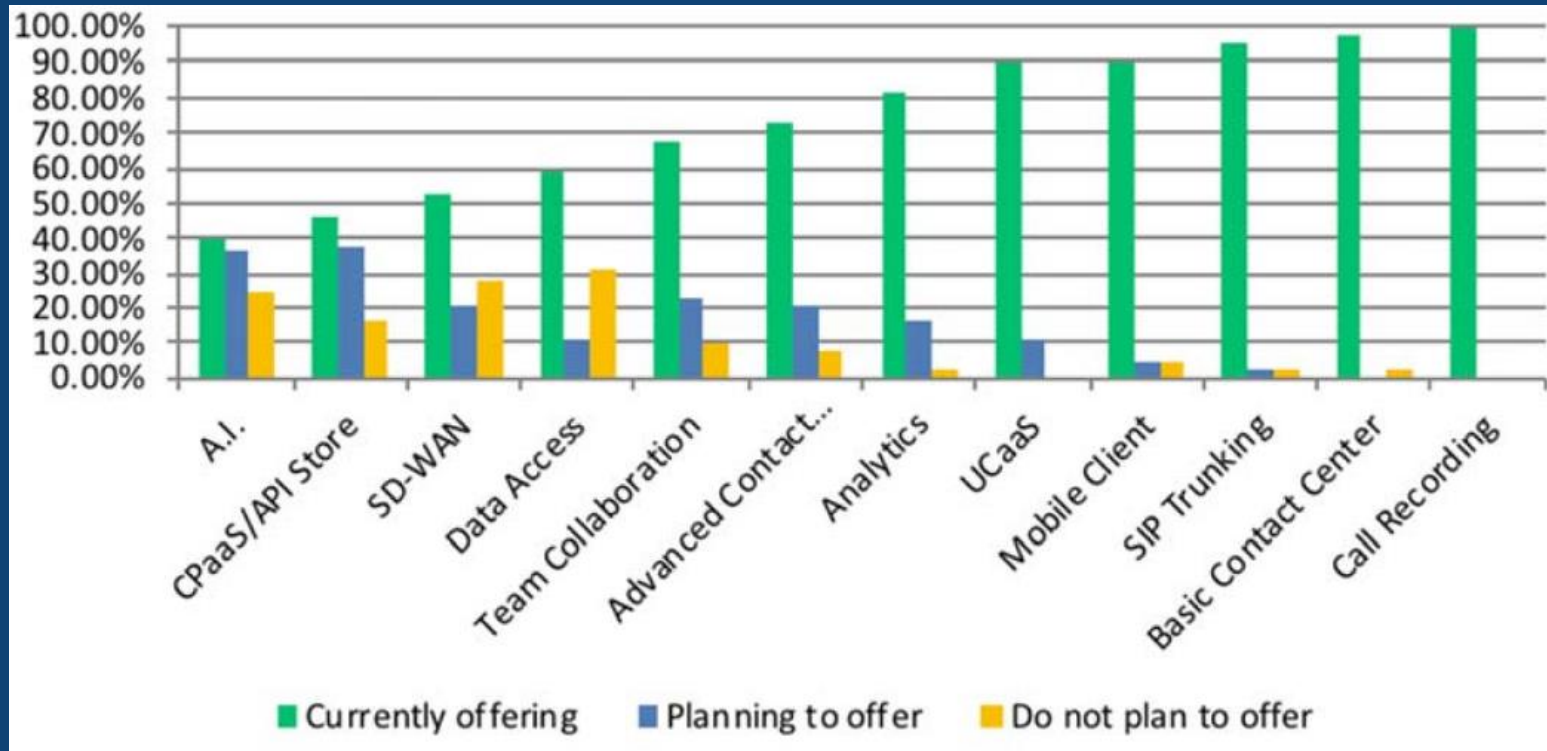
Utilize a mix of commercial and proprietary platforms

Many members are smaller, highly innovative start-ups

## CCA Members' Enterprise Services

CCA's members provide a suite of communications services bundled with VoIP

# CCA'S Views on SHAKEN/STIR

**CCA filed comments and reply comments.**

**CCA supports efforts to curb illegal and fraudulent robocalls.**

**CCA's concerns center on enterprise services**

**Inability to obtain A-level attestation, or to sign at all, will disadvantage CCA members and thousands of businesses.**

CCA members are adversely effected by robocalls

Robocalls are undermining telecommunications ecosystem as consumers refuse to answer calls

CCA Members are eager to participate

Standards for obtaining A-level attestation for common enterprise use cases not yet developed, for example:

- PBXs multi-homed with DIDs from multiple providers
- Phone numbers obtained from carrier partners
- Least cost routing/over the top services
- Legitimate number substitution (*e.g.,* working remotely)
- TDM-services in the call path

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6

# CCA's Proposals

1.  Urge, or require, industry to quickly adopt and test, within specified time frames, methodologies to enable A-level attestation for legitimate enterprise calling services, for example:

    Certificate delegation

    Centralized authenticated telephone number database or registry

2.  Pending adoption of solutions, the Commission should preclude blocking or labeling based on the lack of, or lower level of, attestation.

3.  If blocking is allowed, especially if coupled with a safe harbor, the Commission should require adoption of a robust, transparent challenge mechanism, including real-time notification of blocking.

4.  Preclude blocking of international calls predicated solely on SHAKEN/STIR information.

5. Consider requiring IP interconnection, which the FCC has recognized is "critical."  (2011 CAF Order, para. 1010).

Thank you