



**Daniel McCarthy**  
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November 19, 2018

**VIA ECFS**

Chairman Ajit V. Pai  
Federal Communications Commission  
445 12th St., S.W.  
Washington, D.C. 20554

Re: WC Docket No. 17-97

Dear Chairman Pai:

Thank you for your November 5, 2018 letter. Frontier applauds the Commission's leadership on reducing robocalls and supports the Commission's stated goal to have SHAKEN/STIR implemented by this time next year. With this letter, Frontier commits to meeting this timeframe and implementing SHAKEN/STIR for internet protocol (IP) calls by this time next year.

Frontier continues to actively explore and implement solutions to combat the ever-increasing blight of robocalls, including by testing the SHAKEN/STIR protocol. Indeed, Frontier has already deployed tools to empower its customers to better control what calls do and do not ring on their phones. Frontier remains committed to doing everything feasible to combat the proliferation of these disruptive calls.

Your specific questions are reprinted below, followed by Frontier's responses:

1) What is preventing or inhibiting Frontier from signing calls today?

Frontier is a relatively small piece of the SHAKEN/STIR puzzle as Frontier does not originate much IP call traffic. Accordingly, it has not made sense for Frontier or its customers for the company to fully implement SHAKEN/STIR before the largest call originators do. Additionally, the majority of Frontier's voice lines remain legacy Time Division Multiplexing (TDM) lines, which are not compatible with SHAKEN/STIR.<sup>1</sup> Thus, as Frontier continues to transition lines to IP, Frontier has been evaluating how best to implement SHAKEN/STIR for its customers. Frontier will continue evaluating the best strategy for targeting robocalls in a way that makes the most sense for consumers as the company continues the transition to IP and expanding its network. Frontier commits to implementing SHAKEN/STIR for IP calls by this time next year.

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<sup>1</sup> See Robocall Strike Force Report (Oct. 26, 2016), p. 6, available at <https://transition.fcc.gov/cgb/Robocall-Strike-Force-Final-Report.pdf>.

2) What is Frontier's timeframe for signing calls originating on its network?

Frontier anticipates it can fully integrate SHAKEN/STIR for IP calls originating on its network by this time next year.

3) What tests has Frontier run on deployment and what were the results?

Frontier participated in the Neustar/ATIS SHAKEN/STIR testbed proof-of-concept in late 2017. Frontier has also tested functionality of the SHAKEN/STIR framework for IP originating calls in its lab. Initial results were favorable, and Frontier did not encounter any major issues.

4) What steps has Frontier taken to work with vendors to deploy a robust call authentication framework?

Frontier has been engaged in discussions with several vendors regarding SHAKEN/STIR implementation and has narrowed the field for its likely vendor for IP calls to two providers. Frontier has also discussed the feasibility of a SHAKEN/STIR solution for TDM calls, as those calls comprise the majority of Frontier's originating traffic, and has determined that there is no feasible SHAKEN/STIR solution for TDM-originating calls.

5) How often is Frontier an intermediate provider, and do we intend to transmit signed calls from other providers?

Frontier is not currently an intermediate provider as Frontier does not offer wholesale long-distance termination services; accordingly, all traffic originates from Frontier customers.

6) How does Frontier intend to combat and stop originating and terminating illegally spoofed calls on our network?

Beyond our commitment to deploying SHAKEN/STIR in the next twelve months, Frontier makes Nomorobo technology available to customers. Frontier has continuously worked with Nomorobo to make the customer-facing portal user-friendly to encourage customers to utilize this valuable tool.

7) If the Commission moves forward with authorizing voice providers to block all unsigned calls or improperly signed call, how would Frontier ensure the legitimate calls of our customers are completed properly?

Frontier is committed to working with the Commission and other carriers to ensure that the technology used accurately identifies legitimate calls. Frontier will put originating calls through various platforms to ensure legitimacy. If we find the technology is misidentifying calls, we will work with the industry to come up with a solution.

We look forward to working with the Commission and the industry to continue the critical

work of protecting consumers. Please do not hesitate to contact us if you would like to discuss these important issues further.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. McCarthy', written in a cursive style.

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Daniel McCarthy

cc: Deborah Salons via email ([Deborah.Salons@fcc.gov](mailto:Deborah.Salons@fcc.gov))