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November 19, 2018

**VIA ECFS**

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

**Re: *Call Authentication Trust Anchor*, WC Docket No. 17-97**

Dear Ms. Dortch:

Enclosed please find AT&T's response to Chairman Pai's letter dated November 5, 2018 to John Donovan, CEO of AT&T Communications. Please contact me should you have any questions.

Respectfully submitted,

/s/ Amanda E. Potter

Amanda E. Potter

Enclosure



**Joan Marsh**  
Executive Vice President  
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November 19, 2018

The Honorable Ajit V. Pai  
Chairman  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: AT&T's Timeline for Implementation of SHAKEN/STIR; *Call Authentication Trust Anchor*, WC Docket No. 17-97**

Dear Chairman Pai:

On behalf of AT&T,<sup>1</sup> I write in response to your November 5, 2018 letter to John Donovan, CEO of AT&T Communications, in which you expressed support for our commitment to combating the scourge of illegal robocalls, including through the early implementation of caller ID authentication technology. Under your leadership, the Commission continues to be a valuable partner of industry in the development and implementation of the technical protocols known as Signature-based Handling of Asserted Information Using toKENs and the Secure Telephone Identity Revisited ("SHAKEN/STIR"). AT&T is fully committed to this innovation and has played a leading role in its development, but significant work remains to stand-up SHAKEN/STIR across the industry. As your letters to AT&T and other service providers reflect, it will take enormous commitments on the part of each company for SHAKEN/STIR to achieve its potential and restore consumers' confidence that they can answer their telephones without being subjected to illegal robocalls. AT&T, as it has done since the 2016 Robocall Strike Force, will continue to lead the way, and we thank you and your fellow commissioners for encouraging all service providers to do the same.

As requested, enclosed please find a timeline detailing AT&T's plans for the deployment of SHAKEN/STIR. The timeline includes implementation benchmarks for testing, certain network

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<sup>1</sup> AT&T Services, Inc. files this letter on behalf of AT&T Mobility and its wireline operating affiliates (collectively, "AT&T").

buildout, the exchange of certificates, as well as call-signature display capability. The timeline necessarily is dependent, in significant part, on factors beyond AT&T's control, including coordination with other voice service providers. For example, AT&T's current target of exchanging signed calls with one service provider in the third quarter of next year is based on preliminary discussions initiated earlier this month. The aggressive timetable the parties are considering, as reflected in the timeline, thus could encounter delays.

By the same token, the timeline does not detail all of the concurrent activity, both internal and external to AT&T, to expand and enhance the capabilities of SHAKEN/STIR. Industry's ongoing work to develop best practices for the implementation of SHAKEN/STIR for business VoIP (Enterprise) calls is one such example. AT&T is committed to signing business VoIP calls consistent with those practices once they are available.<sup>2</sup>

AT&T also is considering various alternatives for delivering call-signature displays to consumers, including proposals to leverage the enhanced capabilities of AT&T Call Protect to deliver additional value to customers who subscribe to that service. At a minimum, beginning in the third quarter of 2019, AT&T intends to have the ability to deliver displays for end-to-end VoLTE wireless calls, and currently plans to provide displays to customers.

As the Commission is aware, the precise timing and format for consumer displays remain a topic of discussion and debate among stakeholders. While AT&T is committed to delivering the benefits of SHAKEN/STIR to its customers as soon as reasonably possible, we nevertheless urge caution to ensure that the understandable enthusiasm to implement as quickly as possible does not ultimately undermine the long-term effectiveness of SHAKEN/STIR. AT&T believes that careful, intentional planning regarding consumer call-signature displays is critical to ensure that service providers do not inadvertently miscommunicate the meaning or significance of call signatures (or the lack of such signature) through their consumer displays. More specifically, AT&T believes that the Commission and industry should work together to evaluate and, wherever possible, manage consumer expectations regarding the call-signature displays that service providers present, particularly in the early days of SHAKEN/STIR implementation. Absent appropriate planning and coordination, AT&T is concerned that, as implementation ramps up, if consumers receive call-signature displays for only a small number of legitimate calls (while the remaining legitimate calls go unsigned), consumers could view SHAKEN/STIR as ineffective, and even disregard the call-signature displays. It thus is critical that industry, in partnership with the Commission and other

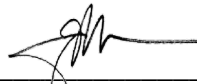
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<sup>2</sup> Likewise, while the timeline reflects that AT&T's initial implementation of SHAKEN/STIR will involve the manual exchange of certificates, AT&T will implement automated certificate exchange once the STI-PA/STI-CA functions are available.

appropriate stakeholders, consider these important issues before call-signature displays are delivered to end users. AT&T will continue ongoing discussions and collaboration with the ATIS SIP Forum Task Force and other implementing service providers and stakeholders to develop and launch call-signature displays in a manner that is transparent to consumers.<sup>3</sup>

Please contact the undersigned should you or staff have questions regarding this letter.

Respectfully submitted,



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Joan Marsh  
Executive Vice President  
Regulatory & State External Affairs  
AT&T Communications

Enclosure

cc: The Honorable Michael O’Rielly  
The Honorable Brendan Carr  
The Honorable Jessica Rosenworcel  
Eric Burger  
Patrick Webre  
Deborah Salons

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<sup>3</sup> Nevertheless, as described above, AT&T will be ready to begin providing call-signature displays to customers.

# SHAKEN/STIR IMPLEMENTATION PLAN

November 2018

