



Federal Communications Commission
Washington, D.C. 20554

February 27, 2020

Jennifer K. McKee
Vice President and Associate General Counsel,
NCTA – The Internet and Television Association
Chairperson, North American Numbering Council (NANC)
25 Massachusetts Avenue, NW
Suite 100
Washington, DC 20001

Re: Call Authentication Trust Anchor Working Group

Dear Chairperson McKee,

The Wireline Competition Bureau would like to thank the North American Numbering Council (NANC) and the Call Authentication Trust Anchor Working Group for all of your excellent work thus far. As Chairman Pai stated, the prior NANC recommendations regarding call authentication represented a substantial step forward in ensuring that calls can be authenticated and verified.¹

Chairman Pai has made fighting unwanted robocalls the Commission's top consumer protection priority, and call authentication is an important part of solving this critical challenge. With the recent passage of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, Congress expressed its support for a robust call authentication system.² As part of the TRACED Act, Congress directed the Commission to "issue best practices that providers of voice service may use as part of the implementation of effective call authentication frameworks . . . to take steps to ensure the calling party is accurately identified."³ We believe the NANC is well suited to provide recommendations regarding best practices for the Commission's consideration.

Thus, we direct the NANC, via its Call Authentication Trust Anchor Working Group, to recommend best practices that would, in the NANC's view, satisfy Congress's directive above if adopted by the Commission. These recommendations should address at least the following questions:

- Which aspects of a subscriber's identity should or must a provider collect to enable it to accurately verify the identity of a caller?

¹ Press Release, FCC, Chairman Pai Welcomes Call Authentication Recommendations from the North American Numbering Council (May 14, 2018), <https://www.fcc.gov/document/chairman-pai-welcomes-call-authentication-framework>.

² Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, S. 151, 116th Cong., at § 4(b)(1) (2019) (TRACED Act).

³ TRACED Act § 4(b)(7).

- What guidelines or standards should providers use when assigning the three attestation levels— A (or “full” attestation), B (“partial”), and C (“gateway”)—of the SHAKEN/STIR framework?
- How should best practices vary depending on the type of subscriber, such as between large enterprises, individuals, and small businesses?
- When should providers consider using third-party vetting services, and how should they make the best use of them?
- Should there be unique industry-wide best practices for knowing the identity of subscribers located abroad? If so, what best practices could we recommend regarding identification of such subscribers?
- Are there any other best practices voice providers can implement “to take steps to ensure the calling party is accurately identified”?

We direct the NANC to approve a written report on its findings on these issues, and to transmit that report to the Wireline Competition Bureau no later than September 25, 2020. The Call Authentication Trust Anchor Working Group must submit its draft report to the NANC and the Wireline Competition Bureau 30 days in advance of the date on which the NANC will vote on the working group’s recommendation.

If you have questions about this referral, please contact either Marilyn Jones, the NANC’s Designated Federal Officer, by telephone at (202) 418-2357, or by email at Marilyn.Jones@fcc.gov, or Jordan Reth, the NANC’s Deputy Designated Federal Officer, by telephone at (202) 418-1418, or by email at Jordan.Reth@fcc.gov. We appreciate the NANC’s commitment to ensuring the security and integrity of the telephone network, and its work to protect American consumers from fraud and deception.

Sincerely,



Kris Anne Monteith

Chief

Wireline Competition Bureau, FCC