May 20, 2024

VIA ELECTRONIC FILING
Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

Re: Cross Border Call Authentication Initiative
   Ex Parte Notice – WC Docket No. 17-97

Dear Ms. Dortch:

On May 16, 2024, representatives from Alliance for Telecommunications Industry Solutions (ATIS), iconectiv, Bandwidth, Google and Microsoft met virtually with representatives from the Federal Communications Commission’s Wireline Competition Bureau to provide an overview of the Cross Border Call Authentication (CBCA) trial that is currently underway.

During the meeting, the attached presentation was reviewed. It was explained that CBCA will allow calls to be verified end-to-end, even if they originate in a country that has not yet deployed SHAKEN. A trial is currently underway and is expected to conclude this year. The CBCA initiative, a collaborative effort between ATIS and iconectiv, is expected to formally launch later this year. Participation in the CBCA initiative is open to all verified international service providers.

In attendance from the Wireline Competition Bureau at the meeting were: Elizabeth Drogula, Associate Bureau Chief; Zachary Ross, Assistant Division Chief, Competition Policy Division; Johnathan Lechter, Attorney, Competition Policy Division; Erik Beith, Attorney Advisor, Competition Policy Division; and Mason Shefa, Attorney Advisor, Competition Policy Division.

Also in attendance at this meeting were: Jim McEachern, Principal Technologist, ATIS; Carroll Gray-Preston, Vice President – Innovation, ATIS; Elizabeth Young, Coordinator – Marketing, Legal, Policy, ATIS; Thomas Goode, General Counsel, ATIS; Sarah Halko, Director of Regulatory and Industry Relations, iconectiv; Mykola Konrad, Head of Product, iconectiv; Ray Wood, Principal Product Manager, iconectiv; Greg Rogers, Head of Global Policy and Regulatory Affairs, Bandwidth; Darah Franklin, Director of Communications Law; Google; Paula Boyd, Senior Director, Government and Regulatory Affairs, Microsoft; and Gunnar Halley, Assistant General Counsel, Microsoft.
A copy of this letter and attachment is being electronically submitted into the record of this processing.

Sincerely,

[Signature]

Thomas Goode
ATIS General Counsel

cc:  Elizabeth Drogula, Associate Bureau Chief;
     Zachary Ross, Assistant Division Chief, Competition Policy Division
     Johnathan Lechter, Attorney, Competition Policy Division
     Erik Beith, Attorney Advisor, Competition Policy Division
     Mason Shefa, Attorney Advisor, Competition Policy Division
     Jim McEachern, Principal Technologist, ATIS
     Carroll Gray-Preston, Vice President of Innovation and Strategic Initiatives, ATIS
     Elizabeth Young, Coordinator – Marketing, Legal, Policy, ATIS
     Thomas Goode, General Counsel, ATIS
     Sarah Halko, Director of Regulatory and Industry Relations, iconectiv
     Mykola Konrad, Head of Product, iconectiv
     Ray Wood, Principal Product Manager, iconectiv
     Greg Rogers, Head of Global Policy and Regulatory Affairs, Bandwidth
     Darah Franklin, Director of Communications Law; Google
     Paula Boyd, Senior Director, Government and Regulatory Affairs, Microsoft
     Gunnar Halley, Assistant General Counsel, Microsoft
CBCA Update

Jim McEachern - Principal Technologist, ATIS
Tom Goode - General Counsel, ATIS
Mykola Konrad – Vice President Product Management, iconectiv
Sarah Halko - Director of Regulatory and Industry Relations, iconectiv
Ray Wood – Principle Product Manager, iconectiv
Paula Boyd – Senior Director, Microsoft Corp.
Gunnar Halley – Assistant General Counsel, Microsoft Corp.
Greg Rogers – Head of Regulatory and Public Policy, Bandwidth
Darah Franklin – Director, Communications Law, Google

May 2024
Context

- Spam and scam calls originate globally
  - Regulation at the national level is only partially effective
    - Blocking at the international gateway
      - Difficult to implement without breaking legitimate services
  - SHAKEN deployment at the national level is viewed as a limitation on its effectiveness (e.g., Ofcom)

- SHAKEN can be deployed end-to-end globally
  - Standard to “federate” individual deployments: ATIS-1000087.v002
  - Allow calls to be signed globally: Cross Border Call Authentication (CBCA)

CBCA is the focus of this presentation
Waiting for STIR/SHAKEN deployment country-by-country creates problems for service providers operating internationally:

> **Indefinite Delay**: most countries do not have STIR/SHAKEN adoption in their immediate plans, for a variety of reasons

> **Divergence harms interoperability**: national deployments can result in unnecessary variations and complexity that interfere with cross-border interoperability

> **National deployments magnify cross-border complexity**: each new deployment will require negotiations with every country that has already deployed STIR/SHAKEN to enable cross-border
Cross Border Call Authentication

support foundational principles
industry-backed
consensus-driven
standards-based
global interoperability
local requirements

CBCA enables SHAKEN attestation globally
> Cross Border Call Authentication (CBCA) will allow calls to be verified end-to-end, even if they originate in a country that has not yet deployed SHAKEN

> CBCA trial being conducted

> Participation in CBCA is open to all verified international service providers
Founding Members

Cross Border Call Authentication Founding Members:

> Microsoft
> Google
> Bandwidth
> RingCentral

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Value Proposition

> Accelerate SHAKEN deployment to allow all voice calls to be signed end-to-end

> Improve answer rates for legitimate calls by allowing them to be authenticated and include Rich Call Data/Branded Calling (e.g., corporate logos to accompany calls) which relies on SHAKEN
  > RCD is an incredibly useful application of SHAKEN that communicates directly to the called party

> Provide alternative to blocking calls at international gateway to minimize disruption of legitimate traffic

> Encourage consistent standardized deployment of SHAKEN to simplify global interoperability.
Use Case: Blocking Inbound Int’l Calls with Domestic CLI

> Regulator mandates may block inbound international calls with domestic caller ID

> **Problem**: Breaks legitimate services:
  > Cloud-based conference bridge
  > Nomadic (VoIP version of roaming)
  > International call centers

> **Solution**: SHAKEN identifies legitimate users:
  > Originating service provider verifies right to use the number and creates PASSporT with full attestation
  > Alternative to blocking allows legitimate calls through
  > Positive response from regulators
Use Case: Calls to the U.S.

> **Status:** International calls into the U.S. cannot use SHAKEN end-to-end:
  > Calls may look like spam
  > GW requirements under consideration

> **Problem:** Limited SHAKEN deployment:
  > USA, Canada, France

> **Solution:** CBCA can allow all global service providers to use SHAKEN end-to-end:
  > Full verification of service providers is required
Use Case: Trusted Partners

**Strategy:** Trusted Partner core network deploys SHAKEN

- OSP generates PASSporT
- TSP verifies PASSporT

**Problem:** Limited to countries with SHAKEN deployment

- USA, Canada, France

**Solution:** CBCA increases number of customers with access to verified calls

- Increase value of SHAKEN for everyone
- Added value includes Rich Call Data/Branded Calling
Next Steps

> Complete CBCA trial
> Launch CBCA live service in 2024
> Formally request STI-GA recognition of CBCA to allow cross border calls to be fully authenticated
> Sign up additional international service providers