July 12, 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 July 10, 2024, representatives from Alliance for Telecommunications Industry Solutions (ATIS), iconectiv, Bandwidth, Google and Microsoft met in-person and remotely with FCC Chairwoman Rosenworcel and Elizabeth Cuttner, Legal Advisor, Wireline and Enforcement, to provide an overview of the Cross Border Call Authentication (CBCA) trial that is currently underway.

During the meeting, the attached presentation was reviewed, and an overview of the CBCA was provided. The CBCA initiative, a collaborative effort between ATIS, iconectiv, and its founding members, 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 a formal launch is anticipated later this year. Once launched and active, participation in the CBCA initiative will be open to all verified international service providers.

The CBCA participants encouraged the FCC to leverage technologically advanced and targeted fraud mitigation tools, such as the CBCA, in place of broad prohibitions (e.g., blocking US CLID that originates outside of the US), to incentivize CBCA adoption by non-US carriers that terminate calls in the US and to encourage regulatory counterparts in other countries to incentivize their carriers to participate in the CBCA voluntarily.

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

Sincerely,

Thomas Goode
ATIS General Counsel

cc: Jessica Rosenworcel, FCC Chairwoman
    Elizabeth Cuttner, Legal Advisor, Wireline and Enforcement, FCC
    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
    Anne Bowling, Senior Director, Legal; RingCentral
Combating Scam Calls is a Global Problem

The FCC has taken significant measures to combat scam calls, including mandating call authentication.

National regulation is only partially effective in reducing scam calls that originate outside the U.S.
National STIR/SHAKEN Deployment

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

STIR/SHAKEN can be deployed end-to-end globally by leveraging voluntary adoption of Cross Border Call Authentication
Cross Border Call Authentication

CBCA Overview

> CBCA will allow calls on IP networks to be verified end-to-end, even if they originate in a country that has not yet deployed SHAKEN
> Participation in CBCA will be open to all verified international service providers
> All participants subject to vetting
> Obligation to support international traceback
> Intention to seek interoperability with STI-GA (U.S. system)
> Trial currently ongoing; plan to launch live in 2024
Founding Members

Cross Border Call Authentication Founding Members:

- Microsoft
- Google
- Bandwidth
- RingCentral

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Use Case 1: Rich Call Data as the Killer App

Improve answer rates for legitimate calls by allowing them to be authenticated and include Rich Call Data (e.g., corporate logos to accompany calls).

- Verified caller is a service that many want to enable, but the only vendor-neutral and provider-neutral approach is Rich Call Data.
- Rich Call Data (RCD) communicates verification directly to the called party (not just their carrier).
- RCD requires SHAKEN.
- CBCA allows this feature to be extended globally.
Use Case 2: Calls to the U.S.

> **Status** Today, international calls into the U.S. cannot use SHAKEN end-to-end:
  > Calls may look like spam

> **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
How CBCA Advances FCC Objectives

- Affords a mechanism for trusting calls to the U.S. from abroad
- Reduces the number of unverified calls to U.S. consumers
- Further isolates potential scam calls
- Participants must support international traceback

Requested FCC Involvement

- We encourage the FCC to leverage technologically advanced and targeted fraud mitigation tools, such as the CBCA, in place of broad prohibitions (e.g., blocking US CLID that originates outside of the US)
- Incentivize CBCA adoption by non-US carriers that terminate calls in the US
- Encourage regulatory counterparts in other countries to incentivize their carriers to participate in the CBCA voluntarily