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October 1, 2025

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L St NE
Washington, D.C. 20554

Re: Standards Explanation Filing
Ex Parte Notice – WC Docket No. 17-97

Dear Ms. Dortch:

In its April 29, 2025, Notice of Proposed Rulemaking (NPRM), the Federal Communications Commission (Commission) seeks comments on certain standards developed by the Alliance for Telecommunications Industry Solutions' (ATIS) Non-IP Call Authentication Task Force (NIPCA). Specifically, the Commission proposes to conclude that the ATIS In-Band Authentication (ATIS-1000095.v002) and Out-of-Band Multiple STI-CPS Authentication (ATIS-1000096) are both developed and reasonably available and therefore satisfy the TRACED Act's requirements. Further, the Commission seeks comments on whether ATIS' Out-of-Band Agreed STI-CPS Authentication (ATIS-1000105) also satisfies the TRACED Act's requirements.¹

Given the NPRM's significant focus on ATIS' standardization efforts, ATIS is pleased to submit the attached, which provides more information on the role and value of ATIS standards and explains the processes by which these standards are developed. As explained in the attached, through its voluntary, open, fair, and contribution-driven processes, ATIS develops standards that are vital to technological innovation, U.S. economic leadership, and the interoperability of communications systems.

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Regards,

Thomas Goode
ATIS General Counsel tgoode@atis.org

¹ These standards are available at no cost from:
<https://access.atis.org/higherlogic/ws/public/documents?view=>.



UNDERSTANDING THE ROLE AND VALUE OF ATIS STANDARDS

The Alliance for Telecommunications Industry Solution (ATIS) is pleased to have the opportunity to provide information about the role and value of its standards and to explain the process by which these standards are developed. Through its voluntary, open, fair, and contribution-driven processes, ATIS develops standards that are vital to technological innovation, U.S. economic leadership, and the interoperability of communications systems.

What Is a Standard?

A standard establishes specifications, guidelines, or characteristics that can be used consistently to ensure that materials, products, and processes meet a common industry understanding of their structure, purpose, and function. As explained in federal regulations, voluntary consensus standards mean common and repeated use of rules, conditions, guidelines, or characteristics for products, or related processes and production methods and related management systems.² Standards are characterized by their voluntary, optional nature and the open, contribution-driven, and fair processes by which they are developed. Standards provide a uniform set of requirements from which industry can innovate based on an agreed-upon set of requirements for the underlying building blocks of the particular technology involved.

SDOs/SSOs. Standards are created and approved by Standards Development Organizations (SDOs, also known as Standard Setting Organizations). In the U.S., SDOs may be accredited by the American National Standards Institute (ANSI), which ensures that the SDO's processes are consistent with ANSI policies, including those related to openness, transparency and due process. ANSI does not write standards itself but instead approves and audits the processes used to create the standards and approves the results as American National Standards (ANS). The role of the SDO is not to determine whether a standard will be effective, but to ensure that it is developed fairly and in accordance with the SDOs policies.

Types of "Standards." There are many different types of deliverables that may be considered a "standard." As defined in ATIS' Operating Procedures, an "ATIS Standard" may refer to a Technical Requirement, Technical Specification, Technical Report, Industry Guideline, White Paper or ANS.³ What is important is not what the document is called but the procedures by which the document is approved.

² 48 CFR §2.101

³ American National Standards or ANS are standards that have been developed pursuant to procedures, such as ATIS', that have been approved by ANSI.

Who Is ATIS?

ATIS is one of the leading SDOs in the Information and Communications Technologies (ICT) industry. ATIS' diverse membership includes wireless, wireline, and VoIP service providers; equipment manufacturers; broadband providers; software developers; consumer electronics companies; public safety and other governmental agencies; and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts (SMEs) work collaboratively in ATIS' open industry committees to develop robust standards that support the evolving needs of the ICT landscape. The organization's efforts are vital in maintaining the technological advancement and interoperability of communications systems on a global scale, ultimately benefiting consumers, industry stakeholders, and public safety entities alike.

Why Are Standards Important?

Standards are vitally important to the U.S. economy and to U.S. consumers. As the U.S. Standards Strategy notes, voluntary, consensus-based, market-driven standards offer enormous benefits to businesses, consumers, and society, facilitating innovation and strengthening economic competitiveness.⁴ The voluntary nature of standards is a critical reason why they foster innovation and economic growth.

Standards significantly improve the U.S. economy by promoting efficiency, safety, and innovation, creating a consistent framework that allows businesses, consumers, and governments to operate with a shared set of expectations. Standards promote innovation and advancement by providing a foundation of clear and uniform characteristics and expectations, encouraging the development of new technologies. Standards are the building blocks for iterative development of technology-fostering consumer spending and business investments, creating jobs, and increasing productivity. The private-sector-led, voluntary approach to standardization is highly effective at promoting the most technologically innovative solutions and advancing U.S. competitiveness worldwide.

Standards provide the foundation for interoperability, facilitate trade, and reduce information asymmetries. This in turn accelerates the evolution of technology, increases consumer confidence, and lowers search costs associated with

Key Aspects of ATIS Standards

VOLUNTARY. The voluntary nature of standards is necessary to effective standardization. There are two aspects of this: (1) participation in the development of standards is voluntary; SDO members may choose to participate or contribute to standards programs but are not required to do so and (2) the implementation of standards is voluntary; stakeholders must have the ability to choose how and when to implement a standard based on that stakeholder's business needs, the needs of customers, and a company's individual technological and operational considerations. Standards also may be withdrawn if/when they are no longer needed. Not every standard is deployed, nor is every standard implementable or considered a comprehensive solution by all stakeholders.

OPEN. Effective standardization requires that all relevant stakeholders can participate. For ATIS, this includes service providers, equipment providers, and other stakeholders such as public safety agencies, associations, providers of support services, etc.

⁴ US Standards Strategy at p. 18.

procurement. The presence of standards fosters a more efficient and reliable economy, driving innovation and economic stability. Without standards, non-interoperable goods would increase costs and create challenges for consumers.

Standards are the basis for technology interoperability. Standards make it possible for products and systems to work together, reducing compatibility issues. Effective standardization identifies areas where interoperability is warranted while not unduly restricting industry's ability to tailor implementations to address market and business needs and technological challenges. Standards are not one-size-fits-all; therefore, each company must determine the appropriateness of implementing a specific consensus-driven solution for a particular application.

Standards can evolve as needed to reflect changes in technology, consumer demand, and business needs. This ensures that standards, and the goods and services based on these standards, continue to be relevant and beneficial. Standards are also iterative, and some standards do not become the basis for real world solutions because they are superseded by other standards that serve the same function. Given the iterative nature of standards, not all revisions may be deployed. The determination regarding which standards or iterations thereof to deploy is best made by the implementer.

ATIS Standards Success Stories. ATIS is proud to have developed many important standards in support of the ICT industry, including:

- **Wireless Emergency Alerting Standards.** ATIS develops the standards that provide for the transmission of Wireless Emergency Alerts (WEA), allowing participating government agencies to provide important information to consumers during emergencies. Since its inception, and based on stakeholder experience and technological advancements, there have been continual enhancements to the WEA system to meet public safety needs. The initial roll-out (WEA 1.0) offered a 90-character text-only message as well as text URLs and phone numbers. WEA 2.0 supported 360-character WEA messages, Spanish- language WEA messages, Public Safety WEA messages, Alert Message prioritization, and consumer opt-in capabilities for receiving State/Local WEA test messages. WEA 3.0 offered improved geo-targeting, device based geo-fencing, 5G support, and other features.
- **Call Authentication Standards.** ATIS' Signature-based Handling of Asserted information using toKENs (SHAKEN) is an industry framework for call authentications, providing the basis for cryptographic authentication and verification of telephone identities in IP-based service provider voice networks. The SHAKEN framework includes mechanisms for authentication, verification, and the transport of caller identity information, addressing issues related to caller ID spoofing and ensuring the integrity of calls. This SHAKEN series of standards has continued to evolve to

Key Aspects of ATIS Standards (cont'd)

FAIR. The processes by which standards are developed must afford participants with due process. Standards processes must be consistently followed and fairly applied, and participants must have an opportunity to appeal decisions regarding the fair and consistent application of processes. ATIS' appeals processes, like many other SDOs, permits process-based appeals and does not give participants an opportunity to revisit technical decisions that were properly considered by the group.

CONTRIBUTION-DRIVEN. ATIS standards are developed by the industry. Industry subject matter experts from ATIS member companies voluntarily contribute their expertise. Written contributions from members are essential to the development of standards. Stakeholders contribute significant time and resources into these contributions and to the development of standards.

meet industry needs, addressing issues such as the use of delegated certificates and the application of SHAKEN to toll free numbers.

- **Industry Numbering Guidelines.** ATIS standards provide guidance to telecommunications companies and other stakeholders regarding the planning, administration, allocation, assignment, and use of the North American Numbering Plan (NANP) numbering resources within the NANP area. These guidelines are acknowledged by the Commission in its rules.⁵ ATIS' work in this area continues to provide important information regarding key issues, including the administration and assignment of Central Office Codes and Thousands-Blocks, the assignment of Carrier Identification Codes, and the criteria for the assignment and administration of Local Routing Numbers.
- **911 and Next Generation 911 (NG911) Standards.** ATIS standards on 911 promote interoperability and reliability across various emergency services networks and are essential for the seamless transmission of data from callers to 911 and to emergency responders. These standards address a wide array of 911 issues, including the application of IP Multimedia Subsystems to NG911, the submission by 911 authorities of requests for NG911 service, and next generation emergency services and messaging.

Standards Are Different than Regulations.

ATIS believes that it is important to distinguish between standards and regulatory mandates. By their very nature, ATIS standards are and must remain voluntary. Standards must evolve to meet changing industry needs and to address technological and other developments. Unlike mandates, standards define a technical or operational framework for voluntary implementation by the industry; they are not mandates, do not necessarily address all technical issues, and do not offer a "plug and play" implementation. Some standards require the development by stakeholders of additional or complementary solutions. The voluntary nature of standards encourages broad participation in the development process. Reference to standards should acknowledge the voluntary and evolving nature of standards. Standards are not a proxy for regulations, nor should the publication of a standard be interpreted as an endorsement by all stakeholders of the solution described in the standard.

To preserve the integrity and innovation made possible by the voluntary nature of the standards process, standards should not be used as the primary basis for regulation without significant independent legal and factual analysis to evaluate whether the standard is viable or appropriate for a regulatory mandate to implement solution(s) based on that standard. To do otherwise would fundamentally undermine the ATIS process and diminish innovation.

Support for private sector-led voluntary consensus standards in lieu of government-created standards has long been the policy of the U.S. Government. In 1995, Congress enacted the National Technology Transfer and Advancement Act, which recognized the importance to the U.S. national economy of technical standards developed by voluntary consensus standards bodies by requiring their use by federal agencies to the extent practicable, and by encouraging federal agency representatives to participate in such standards development work.⁶ OMB Circular A-119 was revised in 1998 to reflect those statutory

⁵ See 47 CFR § 52.13 (d).

⁶ 15 U.S.C. § 272, note.

changes.⁷ This concept was further reinforced by revisions made to Circular A-119 in 2016, which strengthened “the role of agency Standards Executives to encourage better internal coordination and training on standards” and provided “additional guidance for agency participation in standards development activities, including with respect to serving on standards technical committees as well as the boards of standards developing bodies.”⁸

How are ATIS Standards Developed?

The standards development process can take from several months to several years, the pace being influenced by factors such as technical need, business need, engagement of subject matter experts, etc. The process is contribution-driven.

1. **Identification of an issue.** The process begins with the identification of an industry need or challenge that would benefit from standardization and for which no adequate solution currently exists. The issue would be discussed by the members of the group. If there is agreement to initiate the project, the group accepts the issue.⁹
2. **Drafting the standard.** Once an issue has been accepted, participants collaborate to ensure that the proposed solution will satisfy the identified issue. This contribution-driven process will generally begin with a proposed baseline draft to which edits will be made. One or more SMEs may volunteer to serve as editor. Edits are proposed and agreed to by consensus. Once the document has been completed and there are no other contributions, the group will seek approval of the document.
3. **Approval.** ATIS standards must be approved by the membership of the relevant group. Approval of an ATIS standard requires more than just a simple majority. For most ATIS deliverables that are not ANS, approval requires “consensus” rather than approval by letter ballot. Consensus is established when substantial agreement has been reached among those participating in the issue at hand. Substantial agreement means more than a simple majority but does not mean that there is unanimous agreement among participants for universal implementation. All views and objections must be considered, and a concerted effort must be made toward their resolution. For ANS, at least 75% of the votes must be cast, excluding abstentions and negative votes without reasons, to approve the document.¹⁰ For ballots, participants must generally vote within 30 to 60 days (timeframe determined by the group). If substantive comments are received in response to a call for consensus or letter ballot, the group must review and determine whether to modify the draft standard. If modified, the revised document is sent back to the group for ballot.

For ATIS ANSs, there is also a public review process by which non-ATIS members can provide substantive input, which would be addressed by the group.

⁷ See, e.g., OMB Circular No. A-119 (February 10, 1998).

⁸ 2016 Revisions to OMB Circular No. A-119, “Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities” (January 27, 2016) at 4, available at <https://www.nist.gov/standardsgov/what-we-do/federal-policy-standards/key-federal-directives>.

⁹ ATIS does this through development of an “Issue Statement,” which requires supporters to explain the business need, suggested solution, associated groups or issues, whether the deliverable is anticipated to be an ANS, and the Issue Champion.

¹⁰ Some ATIS groups also ballot ATIS standards.

4. **Publication.** Once approved, the standard is made available. Publication of a standard means that the standard, as well as the applicable standards process, is complete. It does not mean that all participants in the standards process recommend or endorse adoption of solutions based on that standard. The publication of the standard does not imply that the standard will be effective for any particular stakeholder. ATIS standards are publicly available from <https://atis.org/standards-and-specifications/>. ATIS also maintains some standards on its website for public download. These standards are available at: [https://access.atis.org/higherlogic/ws/public/documents?view=.](https://access.atis.org/higherlogic/ws/public/documents?view=)
5. **Periodic post-publication review.** The group that published the standard retains the right to revisit, revise, or withdraw the document. For ANS, the group must review the document generally every five or ten years; this is dependent on when the document was last reaffirmed or revised.

Conclusion

ATIS appreciates the opportunity to explain the role and value of voluntary standards and provide further information about ATIS standardization processes. Standards are vitally important to the U.S. economy and U.S. global competitiveness, to promoting innovation, and to lowering costs. While standards are developed through rigorous deliberation and approved by a broad set of stakeholders, publication of a standard does not mean that all stakeholders will implement it. Decisions regarding the implementation of standards are best made by the stakeholders.

ATIS is pleased to have the opportunity to support the development of solutions to challenges facing the telecommunications Industry. If there are any questions or comments, please Thomas Goode, ATIS General Counsel, at tgoode@atis.org.