Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	
Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991	)	CG Docket No. 02-278
	)	
Dismissal of Outdated or Otherwise Moot Robocalls Petitions	)	CG Docket No. 25-307

COMMENTS

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments on behalf of the Joint ATIS-SIP Forum Internet Protocol Network-to-Network Interconnection Task Force (IP-NNI Task Force) in response to the Federal Communications Commission's (Commission) October 29, 2025, *Ninth Further Notice of Proposed Rulemaking in CG Docket No. 17-59; Seventh Further Notice of Proposed Rulemaking in WC Docket No. 17-97; Further Notice of Proposed Rulemaking in CG Docket No. 02-278; Public Notice in CG Docket No. 25-307* (*Notice*). In the *Notice*, the Commission proposes to require terminating voice service providers to transmit verified caller name for presentation on consumers' handsets whenever they transmit call authentication information indicating that the originating number is unlikely to be spoofed, suggests ways for originating voice service providers to verify that the caller name and other information about the caller that they transmit is accurate, and proposes to require providers to identify calls that originate from outside of the United States.[1] In these

[1] *Notice* at ¶2.

comments, the IP-NNI Task Force clarifies and provides additional information about the SHAKEN standards, notes that the industry has not performed RCD interoperability testing and that RCD interoperability will depend on vendor implementation, explains that gateway providers do not know the identity of all callers' countries of origin, and opposes the Commission's proposal to require gateway providers authenticating foreign originated calls using SHAKEN to encrypt information about calls originating overseas by inserting this information in the OrigID or using a unique OrigID for each country.

I. Background/Introduction.

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless, wireline, and VoIP service providers; equipment manufacturers; broadband providers; software developers; consumer electronics companies; public safety 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 has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees, including ATIS Packet Technologies and System Committee (PTSC).

ATIS' PTSC develops standards related to services, architectures, signaling, network interfaces, next generation carrier interconnect, cybersecurity, lawful intercept, and government emergency telecommunications service within next generation networks. PTSC also evaluates the impact of this transition and develops solutions and recommendations where necessary to

facilitate and reflect this evolution.

The SIP Forum is an industry association with members from the leading IP communications companies. Its mission is to advance the adoption and interoperability of IP communications products and services based on SIP. The forum promotes SIP as the technology of choice for the control of real-time multimedia communication sessions throughout the Internet, corporate networks, and wireless networks; directs technical activities aimed at achieving high levels of product interoperability; provides information on the benefits and capabilities of SIP; and highlights successful applications and deployments.

The IP-NNI Task Force identifies baseline features that should be common to all IP-NNI implementations for voice service. The IP-NNI Task Force also defines a common set of implementation rules for SIP Service Providers (SSP) who desire to interconnect with another SSP for voice initially. The IP-NNI Task Force specifications identify which standards and options must be supported and provide SSP's with a precise description of the IP-NNI in the areas where the standards offer multiple options or are ambiguous. The SHAKEN series of standards developed by the task force includes:

- Signature-based Handling of Asserted information using toKENs (SHAKEN) (ATIS-1000074.v003), an industry framework for managing and deploying Secure Telephone Identity (STI) technologies with the purpose of providing end-to-end cryptographic authentication and verification of the telephone identity and other information in an IP-based service provider voice network.
- SHAKEN: Governance Model and Certificate Management (ATIS-1000080.v006), which identifies the key roles/functions involved in distributing and managing SHAKEN certificates.
- Technical Report on SHAKEN APIs for a Centralized Signing and Signature Validation Server (ATIS-100082), which provides a Technical Report on a SHAKEN APIs used to support a Centralized Signing and Signature Validation Server.
- Technical Report on a Framework for Display of Verified Caller ID (ATIS-100081), which provides a framework for signaling verified Caller ID information from the network to a User Equipment (UE) and displaying the information on the UE in a uniform manner, independent of technology.

- Signature-based Handling of Asserted information using toKENs (SHAKEN): Calling Name and Rich Call Data Handling Procedures (ATIS-1000094.v002), expands the SHAKEN framework, introducing mechanisms for authentication, verification, and transport of calling name as well as other enhanced caller identity information (e.g., images, logos) and call reason, and describes how they are handled in various call origination and termination scenarios.

II. Comments

In the *Notice*, the Commission states that, while the SHAKEN standards apply the determination of the attestation level only to the authenticating provider's knowledge of its direct customer and that customer's right to use the telephone number it transmits, the SHAKEN RCD standard requires the originating voice service provider to vet the caller identity information it transmits.[2] This statement about the RCD standard[3] is not accurate – there are situations in which the originating service provider cannot and does not vet the caller identity information. The RCD standard permits two different types of RCD implementations when the originating service provider signs a "shaken" PASSporT with "rcd" claims, or an "rcd" PASSporT: (1) by the originating service provider, who may perform authentication services for RCD for its originating customers' calls; or (2) alternatively, the information could be obtained from a trusted non-SHAKEN entity such as an Authoritative Database as described in ATIS-1000067.[4]

If the Commission does require all voice service providers to implement RCD in their IP networks for all calls, it seeks comment on whether any standards work remains to be done to ensure that RCD is implementable across all IP networks and whether interoperability testing needs to be completed.[5] The IP-NNI Task Force notes that there is currently no industry testbed with respect to RCD for interoperability testing between implementations. It is also important to

[2] *Notice* at ¶13.
[3] ATIS-1000094.v002.
[4] ATIS-1000080.v006 at Section 5.3.2.1.
[5] *Notice* at ¶63.

note that there are multiple RCD specifications (IETF, IP-NNI Task Force), and not all these specifications are aligned. Interoperability is dependent on vendor implementation.

The Commission notes that conditioning A-level attestations on verification of end-user caller identity would deviate from the current STIR/SHAKEN standards and seeks comments on challenges associated with such a deviation.[6] The IP-NNI Task Force notes that this deviation could create compatibility issues if the new implementations are not backwards compatible with existing SHAKEN deployments.

The Commission asks for input on the ability of gateway providers to determine the country of origin for a call and for providers across the call path to include the country of origin in caller identity information when transmitting a call. [7] The IP-NNI Task Force notes that gateway providers cannot identify all callers' countries of origin. Gateway providers do not know, for example, the countries of origin for calls from IP wholesalers or from overseas providers that may share infrastructure and resources (as occurs in some places in the European Union).

The Commission also asks whether it should require gateway providers authenticating foreign originated calls using STIR/SHAKEN to encrypt information that the calls originated overseas in the PASSporT, perhaps by inserting this information in the OrigID or using a unique OrigID for each country.[8] The IP-NNI Task Force strongly believes that OrigID cannot and should not be used as proposed by the Commission. The OrigID is an opaque identifier that only has meaning to the service provider that has provisioned it; it has no meaning outside of that service provider's network. Moreover, because the gateway provider would not know the country

[6] *Notice* at ¶68.
[7] *Notice* at ¶72.
[8] *Notice* at ¶72.

of origin for all calls, the provider would not have this information to encrypt in the PASSporT. The proposed use of the OrigID also would deviate from the STIR/SHAKEN standards, as current standards do not contemplate upstream use of the OrigID or multiple OrigIDs for a call. For these reasons, the IP-NNI Task Force opposes the Commission's proposed use of OrigID.

III. CONCLUSION

The IP-NNI Task Force appreciates the opportunity to provide its input to the *Notice* and urges the Commission to consider the input above.

Respectfully submitted,

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