

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

In the Matter of)	
)	
Advancing IP Interconnection)	WC Docket No. 25-304
)	
Accelerating Network Modernization)	WC Docket No. 25-208
)	
Call Authentication Trust Anchor)	WC Docket No. 17-97

Comments

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission’s (Commission) October 29, 2025, *Notice of Proposed Rulemaking (NPRM)* in the above-referenced dockets. In the *NPRM*, the Commission seeks comment on network interconnection issues. These comments provide an information on standards that are relevant to the Commission’s consideration of these issues.

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.¹ Nearly 600 industry subject matter experts work collaboratively in ATIS’ open industry committees, including ATIS Packet Technologies and System Committee (PTSC). PTSC develops standards

¹ 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.

related to services, architectures, signaling, network interfaces, next generation carrier interconnect, cybersecurity, lawful intercept, and government emergency telecommunications service within next generation networks. It 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, and 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.

These comments are submitted on behalf of the Joint ATIS-SIP Forum Internet Protocol Network to Network Interconnection Task Force (IP-NNI Task Force), which 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. 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 are ambiguous or offer multiple options. The SHAKEN series of standards has been developed by the task force.²

² These include: Signature-based Handling of Asserted information using toKENs (SHAKEN) (ATIS-1000074.v003); SHAKEN: Governance Model and Certificate Management (ATIS-1000080.v006); Technical Report on SHAKEN APIs for a Centralized Signing and Signature Validation Server (ATIS-100082); Technical Report on a Framework for Display of Verified Caller ID (ATIS-100081) and Signature-based Handling of Asserted information using toKENs (SHAKEN): Calling Name and Rich Call Data Handling Procedures (ATIS-1000094.v002).

II. Comments

In the *NPRM*, the Commission seeks input on IP interconnection issues, including the role of technical standards-setting bodies in developing a framework for IP interconnection.³ The IP-NNI Task Force notes that standards play an important role in supporting interconnection. The task force is pleased to report that it is working on an update to the Joint Technical Report on IP NNI Profile (ATIS-1000063), which defines an IP NNI profile and specifies an NNI profile applicable to the interface between the home network of the originating party and the home network of the terminating party, or between the home network of either party and a transit network.⁴ The update will reflect the numerous changes that have been made to underlying standards, user endpoint capabilities, and service provider core network capabilities.

The IP-NNI Task Force also has published a technical report on VoIP Interconnection over the Public Internet (ATIS-1000100).⁵ The report describes a profile for Voice over IP (VoIP) Service Providers (SPs) who choose to interconnect over the public Internet. It recommends mechanisms for establishing IP connectivity, securing the signaling and media, and proposing bilateral agreements with respect to codec selection to address Quality of Service (QoS) impacts as well as resources for real-time media traversing the unmanaged public Internet. The report is limited to IP transport aspects only; it does not address business issues.

³ *NPRM* at ¶62.


⁴ *Joint ATIS/SIP Forum Technical Report – IP NNI Profile ATIS-1000063 – SIP Forum TWG-6* (ATIS -1000063), Approved May 2015. This document is available at no cost from: <https://access.atis.org/higherlogic/ws/public/download/45031/ATIS-1000063.pdf/latest>.

⁵ *VoIP Interconnection over the Public Internet (ATIS-1000100)*, Approved December 12, 2022. This document is available at no cost from: <https://access.atis.org/higherlogic/ws/public/download/69420/ATIS-1000100.pdf/latest>.

III. Conclusion

ATIS appreciates the opportunity to provide its input to the *NPRM*.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode", written in a cursive style.

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