

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

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Dismissal of Outdated or Otherwise Moot)	CG Docket No. 25-307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

**REPLY COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby replies to the comments submitted 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 these comments, ATIS acknowledges that there is broad support among commenters for the ATIS Rich Call Data standard and for a neutral entity to vet branded calling solutions. ATIS would welcome the opportunity to serve in this role. ATIS also urges the Commission to leverage technologically advanced and targeted fraud mitigation tools, such as the Cross Border Call Authentication (CBCA), in place of broad mandates and to incentivize CBCA adoption.

I. INTRODUCTION

A. About ATIS

ATIS¹ is the hub for industry anti-robocalling efforts and the SHAKEN ecosystem for the development of technical standards on call authentication to the management of multiple industry coalitions.

- The Joint ATIS-SIP Forum Internet Protocol Network to Network Interconnection Task Force (IP-NNI Task Force), for example, develops and maintains the SHAKEN series of standards.² These standards identify baseline features that should be common to all IP-NNI implementations for voice service, define 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.
- ATIS also has a significant role in promoting the effective and efficient operation of the Secure Telephone Identity (STI) ecosystem. The STI Governance Authority, which operates under the auspices of ATIS, defines the rules governing the certificate management infrastructure to ensure effective use and security of SHAKEN certificates.
- As explained below, ATIS is also launching the CBCA in concert with TNS (the affiliated successor to iconectiv) and the CBCA Founding Members – Bandwidth, Google, Microsoft, and RingCentral. This initiative will allow calls to be verified end-to-end in an all-IP traffic exchange environment, even if they originate in a country that has not yet deployed SHAKEN. A trial has been successfully completed, 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 IP-based service providers.

¹ ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for the Information and Communications Technologies (ICT) industry. ATIS' diverse membership includes key stakeholders, including wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP). Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees.

² ATIS Standard on Signature-based Handling of Asserted information using toKENs (SHAKEN): Calling Name and Rich Call Data Handling Procedures (ATIS 1000094v.2), approved April 30, 2025. This document is available at no cost from https://access.atis.org/higherlogic/ws/public/document?document_id=81612.

II. REPLY COMMENTS

A. There is Support Among Commenters for the ATIS RCD Standard and for the Need for Neutral Vetting of all Call Presentation Solutions

ATIS is pleased to see support for its ATIS RCD standard³ and the SHAKEN ecosystem, which ATIS first championed over ten years ago.”⁴ This industry-led ecosystem continues to foster innovation. For example, branded calling services demonstrate how the SHAKEN standards allow the industry to rapidly develop sophisticated solutions to deliver enhanced caller identity information to consumers. ATIS believes that, with proper controls, secure call identifying information can be a powerful tool.

Existing call presentation solutions provided by reputable entities have controls in place to make sure the information that is inserted into the header at origination is thoroughly vetted and accurate. BCID LLC for example notes that its solution relies on neutral Certificate Authority dedicated to BCID traffic and uses Public Key Infrastructure compliant with the highest level of security under the Federal Information Security Modernization Act (FISMA) – a cryptographic root key held under lock and key in underground vaults across two tectonic plates in duplicated, geographically dispersed locations.⁵ TransUnion notes that it, along with Transaction Network Services (TNS) and First Orion, have implemented branded calling solutions in conjunction with their terminating-provider partners that follow robust, well-established KYC practices that vet the calling entity, the right to use a telephone number, and the

³ See Twilio Comments at pp. 8-9; Cloud Communications Alliance Comments at p. 3; INCOMPAS Comments at p. 11; Bandwidth Inc. and Bandwidth.Com CLEC, LLC Comments at p. 8; and Somos, Inc. Comments at p. 2.

⁴ Bandwidth Comments at p. 8.

⁵ BCID LLC Comments at p. 6.

branded content (e.g., display name, logo, call reason) throughout their customers' use of the service⁶

ATIS agrees with commenters who recommend a flexible, technology-neutral approach to branded calling solutions. CTIA for example recommends that “while the marketplace for branded calling technologies develops, the Commission should encourage industry to develop a flexible, technology-neutral enhanced identity verification framework for branded callers.”⁷ The Computer & Communications Industry Association (CCIA) similarly recommends that the industry be encouraged to develop flexible, technology-neutral methods to enhance the identity verification framework and call authentication for business-branded callers.”⁸ Verizon urges the Commission to trust the principles of competition and the free market by adopting a stance that promotes technological neutrality and allows providers to use RCD and other solutions that securely transmitting caller identity information.⁹ To ensure that new call presentation solutions continue to be provided by reputable entities with robust controls in place, service providers and their operational controls should be vetted.

ATIS also agrees with USTelecom that the Commission should carefully consider how accuracy and accountability can be maintained across “complex, multi-provider call paths that include downstream platforms and device-level presentation decisions outside the control of the originating provider.”¹⁰ One way to ensure that new call presentation solutions continue to be provided by reputable entities that have robust controls in place, service providers and their operational controls should be vetted, as has been suggested by a number of commenters. ACA

⁶ TransUnion Comments at p. 14,

⁷ CTIA Comments at p. 20.

⁸ CCIA Comments at p. 2.

⁹ Verizon Comments at p. 7.

¹⁰ USTelecom Comments at pp. 5-6.

for example explains in its comments that, because “[v]erification is the cornerstone of trust ... there should be a neutral, third-party vetting process rather than relying solely on originating providers’ know-your-customer (KYC) processes”¹¹. VON similarly suggests that “[l]ike STIR/SHAKEN, customer verification could be managed by trusted, neutral third parties.”¹² Numeracle recommends that a neutral vetting process, either run by the Commission or a neutral third party, such as a standards organization or industry working group, to assess whether a proposed solution meets the core requirements of vetting, verification, and trustworthiness.¹³

In conjunction with its leadership role of the STIR/SHAKEN standards and ecosystem, ATIS is well positioned to be a neutral vetting entity and would welcome the opportunity to serve in this role. For over forty years, ATIS has served as a neutral forum for industry to tackle important issues from industry numbering to wireless issues to network reliability. ATIS’ fair, open, and consensus-based procedures, broad membership and extensive experience with the SHAKEN ecosystem make ATIS an appropriate choice to serve as a neutral vetting entity for branded calling solutions.

B. Commenters Support Cross-Border Call Authentication

ATIS is also pleased to see support among commenters for the Cross Border Call Authentication framework and governance model that ATIS has developed in partnership with Bandwidth, Google, Microsoft, RingCentral, and TNS. The CBCA initiative will allow calls to be verified end-to-end in an all-IP traffic exchange environment, even if they originate in a country that has not yet deployed SHAKEN. The CBCA’s purpose is to advance consumer-

¹¹ VON notes in its comments that the CBCA, in addition to providing a vetting system for legitimacy and enforcement procedures at the network level including traceability, will also benefit RCD, which can be used to transmit the caller’s identity when the originating VSP wants to share it with the terminating providers. See VON Comments at p. 5.

¹² VON Comments at p. 4.

¹³ Numeracle Comments at p. 16.

driven, technologically-rich services that are more effective at preventing fraudulent and spoofed phone calls, especially those originating from outside a country's borders, by establishing a secure root of trust for call authentication. A trial of this initiative has been successfully completed¹⁴ and, once launched (anticipated 1st Quarter 2026), participation in the CBCA initiative will be open to all verified international service providers.¹⁵

A number of commenters expressed their support for the broader adoption of STIR/SHAKEN and deployment of the CBCA to address foreign-originated calls. INCOMPAS recommends that, “[t]o tackle the problem of foreign originated illegal robocalls, the Commission should focus on encouraging the adoption of STIR/SHAKEN in other countries and implementation of cross-border frameworks, like the CBCA framework, for tracebacks and trusted calling at the network level, regardless of country of origin. Such proposals will address the Commission’s security concerns while preserving legitimate international business communications and avoiding fee-based verification schemes that would impose unnecessary and likely discriminatory costs on service providers.”¹⁶ Bandwidth recommends that “additional deployment and use of STIR/SHAKEN in global all-IP ecosystems, like the Cross Border Call Authentication (“CBCA”) framework and governance model, can lead the industry forward with technologically advanced methods for addressing illegal foreign robocalls, while avoiding backward-looking numbering-based proposals that would stall key objectives and potentially disrupt the PSTN ecosystem unnecessarily.”¹⁷ CTIA encourages the Commission to allow ongoing industry cross-border call authentication efforts to further develop rather than requiring

¹⁴ Cross Border Call Authentication (CBCA) Trial Results Report. This report is available at no cost from: <https://atis.org/resources/cross-border-call-authentication-cbca-trial-results-report/>,

¹⁵ See ATIS Ex Parte Notice, WC Docket No. 17-97 (filed July 12, 2025).

¹⁶ INCOMPAS Comments at pp. 6-7 (footnoted omitted).

¹⁷ Bandwidth Comments at p. 15.

gateway providers to mark calls that originate from outside the U.S. and TSPs to transmit to consumers' handsets an indicator that a call originated from outside of the U.S.¹⁸ VON urges the Commission to encourage other countries to adopt the U.S.'s STIR/SHAKEN framework so they can leverage the CBCA to verify that calls traversing international gateways are authorized to use domestic phone numbers and should be passed along to terminating providers."¹⁹

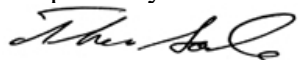
ATIS urges the Commission to leverage technologically advanced and targeted fraud mitigation tools, such as the CBCA, in place of broad mandates and to incentivize CBCA adoption by non-US carriers that terminate calls in the US and encourage regulatory counterparts in other countries to incentivize their carriers to participate in the CBCA voluntarily.

The CBCA has requested interoperability with the STI-GA to permit attestations for calls that originate internationally can be passed through the call path and verified by the terminating provider in the U.S.

I. CONCLUSION

ATIS appreciate the opportunity to respond to the comments submitted in response to the Notice and urges the Commission to consider the input above.

Respectfully submitted,



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¹⁸ CTIA Comments at p. 19.

¹⁹ VON Comments at p. 6.