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May 15, 2026

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Input to Draft FNPRM
Ex Parte, WT Docket No. 17-97, GC Docket No. 17-99

Dear Ms. Dortch:

On May 13, 2026, representatives from the STI Governance Authority (STI-GA) Board and the Alliance for Telecommunications Industry Solutions (ATIS) met remotely with representatives from the Federal Communications Commission's (Commission) Wireless Competition Bureau (WCB) to discuss the draft *Further Notice of Proposed Rulemaking (FNPRM)* in the above-referenced dockets.

In the meeting, ATIS and STI-GA Board representatives explained that, in reviewing the draft *FNPRM*, factual inaccuracies and mischaracterizations were identified that, if left uncorrected, could undermine the record and lead to misguided regulatory outcomes. The attached presentation includes proposed changes to the draft *FNPRM* to correct the record and includes input from the Joint ATIS-SIP Forum Internet Protocol Network to Network Interconnection Task Force (IP-NNI Task Force) and the STI-GA Board.

Glenn Clepper, STI-GA Board Chair, noted that the STI-GA and the IPNNI Task Force support the Commission's commitment to combating illegal robocalls and protecting American consumers from unlawful and fraudulent calling activity. STIR/SHAKEN remains a critical tool in this effort, and the STI-GA is dedicated to the continued integrity and effectiveness of the framework.

As explained in the attached, the STI-GA and IP-NNI Task Force suggested removing questions in Paragraph 64 of the draft about delegate certificates, noting that these questions appear to be based on misunderstanding of the existing certification framework. Authorization of enterprises or end users by the STI Policy Authority is not required for those entities to obtain delegate certificates and delegate certificates are not issued by the Certification Authority. Delegate certificates establish a verified association between the end user customer and the telephone number that is being used by a service provider to originate the call when that service provider did not issue the telephone number.

The STI-GA Board also provided input proposing revision to:

- Paragraph 12 to more accurately reflect the role of the STI-GA;

- Paragraph 46 to recognize that the STI-GA already sets a maximum lifetime for STI certificates;
- Paragraph 47 to align the proposed text with the STI-GA conflict of interest policy;
- Paragraph 48 to delete incorrect statements pertaining to the STI-GA's revocation of tokens; and
- Paragraph 49 to delete text that improperly implies that STI-GA policy ties Certification Authorities to the way service providers use their certificates.

During the meeting, the two-week maximum lifetime of SPC tokens was discussed. Brent Struthers, STI-GA Director, explained that a service provider must get a new SPC token before it can get a new STI certificate if it has been more than two weeks since the provider received its last SPC token.

The STI-GA revocation policy was also discussed. The difference between the revocation of STI certificates versus the revocation of SPC tokens was also discussed. Mr. Struthers explained that SPC tokens are used only to get STI certificates, which are used to sign calls.

Mr. Struthers explained that STI-GA Board follows an established process when a complaint is received. That process sometimes results in the service provider remediating the problem before the STI-GA Board revokes or suspends the provider. There is also a probationary period that the STI-GA Board may impose during which additional complaints against the provider would permit expedited revocation.

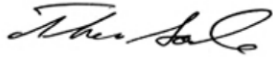
Finally, Mr. Struthers noted that the STI-GA Board does not make detailed information about SPC token revocations publicly available but would consider making aggregated information about the numbers and types of revocations available.

In attendance from the WCB were: Cara Voth, Deputy Bureau Chief; Jodie May, Division Chief, Competition Policy Division; Chris Laughlin, Deputy Division Chief, Competitive Policy Division; Mason Shefa, Attorney Advisor, Competition Policy Division; and John Menges, Attorney Advisor, Competitive Policy Division.

In attendance on this call representing the STI-GA Board were: Glenn Clepper, STI-GA Board Chair; Gunnar Halley, STI-GA Board Vice-Chair; John Marinho, STI-GA Board Director; Michael Starkey, STI-GA Board Director; and Courtney Tolerico, STI-GA Board Director (Alternate). The following ATIS staff were present: Brent Struthers, STI-GA Director; David Young, Vice President – Technology Policy and Government Relations; Drew Greco, ATIS Senior Coordinator – Standards Development; Jackie Wohlgemuth, ATIS Director – Standards Development; Jo Seibel, ATIS Manager – Legal, Policy and Marketing; and Thomas Goode, ATIS General Counsel.

We welcome the opportunity to engage with the Commission and appreciate the ongoing dialogue. If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas Goode".

Thomas Goode
ATIS General Counsel

cc: Cara Voth, Deputy Bureau Chief, WCB
Jodie May, Division Chief, Competition Policy Division, WCB
Chris Laughlin, Deputy Division Chief, Competitive Policy Division, WCB
Mason Shefa, Attorney Advisor, Competition Policy Division, WCB
John Menges, Attorney Advisor, Competitive Policy Division, WCB