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

In the Matter of	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59
	)	

Comments of the Secure Telephone Identity Governance Authority

Alliance for Telecommunications Industry Solutions

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TABLE OF CONTENTS

SUMMARY

In these comments, the Secure Telephone Identity Governance Authority (STI-GA) supports the Commission's continued focus on strengthening the STIR/SHAKEN ecosystem and reducing illegal robocalls but notes that the *FNPRM* overstates the roles of the STI-GA and of Certification Authorities and does not accurately reflect the effectiveness of the STI ecosystem. In the comments, the STI-GA:

- Recommends that the STI-GA continue to enforce its policies for SPC token eligibility, revocation, and Certification Authority compliance, while leaving broader robocall enforcement, including enforcement of the Commission's rules, to the Commission and law enforcement;
- Urges the Commission not to impose prescriptive know-your-upstream-provider vetting;
- Recommends that the STI-GA not be required to make speculative judgments about whether an entity may violate rules in the future;
- Notes that there is no evidence that shortening the current maximum certificate lifetime would strengthen authentication;
- Opposes additional Certification Authority conflict-of-interest requirements absent evidence that existing Certification Authority relationships are causing noncompliance issues;
- Supports enhanced coordination with the Industry Traceback Group, but opposes mandatory coordination with call analytics providers;
- Urges the Commission to adopt the STI-GA's existing improper-attestation definition;
- Recommends that permanent removal from the STI ecosystem be limited to egregious conduct and follow due process;
- Opposes requirements to accept anonymous or informal complaints because such processes could invite misuse and undermine accountability;
- Notes that Certification Authorities should be evaluated only on responsibilities within their control, such as compliance with certificate issuance and revocation policies, not on providers' downstream use of certificates;
- Urges the Commission to provide adequate time for implementation and STI-GA actions;
- Notes that there are resource, liability, antitrust, cost, governance, and operational barriers that would make it challenging to implement the proposed rules;
- Strongly recommends that, if new responsibilities are imposed, the Commission should provide broad liability and antitrust protection for STI-GA representatives, ATIS, vendors, and participating companies;
- Agrees that final STI-GA revocation or Certification Authority removal decisions should be appealable to the Commission after exhaustion of STI-GA processes but opposes allowing appeals of STI-GA inaction to the Commission;
- Supports continued ongoing dialogue with the Commission and believes that quarterly reporting would be reasonable if the reporting obligations are tailored, practical, and targeted to information useful to the Commission;

- Notes that the Commission does not have authority over the STI-GA as suggested in the *FNPRM* but explains that there are viable, better alternatives available to address the governance concerns raised in the FNPRM that do not require the Commission to have such authority; and
- Urges the Commission to defer the governance proposals in this *FNPRM* until the Commission has adopted its KYUP and RMD rules and the industry and Commission have had the opportunity to evaluate the effectiveness of these rules.

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COMMENTS OF THE SECURE TELEPHONE IDENTITY GOVERNANCE AUTHORITY

The Secure Telephone Identity Governance Authority Board (STI-GA) hereby submits these comments in response to the Federal Communications Commission's (Commission or FCC) May 21, 2026, *Further Notice of Proposed Rulemaking* (*FNPRM*) in the above-referenced dockets.[1] In the *FNPRM*, the Commission seeks to enhance STIR/SHAKEN by, among other things, proposing to expand the role of the STI-GA and to direct the STI-GA to modify its policies. The participants in the STI-GA appreciate the Commission's continued focus on strengthening the STIR/SHAKEN ecosystem and reducing illegal robocalls and share the Commission's objective of ensuring that caller ID authentication remains a reliable tool for identifying the source of traffic to support effective enforcement against unlawful calling. These comments offer recommendations to improve the effectiveness of the existing Secure Telephone Identity (STI) ecosystem, and support portions of the proposals in the *FNPRM*. But as explained below, the STI-GA respectfully cannot support proposals that, in excess of the limits of the Commission's authority, would improperly impose new vetting, investigation and enforcement responsibilities on the STI-GA that are outside the scope of the STI-GA's expertise and its

[1] *Call Authentication Trust Anchor, Advanced Methods to Target and Eliminate Unlawful Robocalls*, Further Notice of Proposed Rulemaking, WC Docket No. 17-97, CG Docket No. 17-59, 91 FR 42602 (July 9, 2026) (*FNPRM*).

proper role in the broader voice ecosystem.

As explained below, the STI-GA establishes and administers objective industry-led policies for access to the STIR/SHAKEN trust environment; it was not created, staffed, funded, or legally structured to serve as a substitute federal enforcement body. The Commission's proposals would significantly expand the STI-GA's responsibilities by requiring it to collect and evaluate provider information, make predictive and subjective compliance judgments, investigate suspected violations, impose time-sensitive sanctions, and report on enforcement activity. Those proposals would move the STI-GA beyond its historical function and commandeer an industry-led governance body into an enforcement arm of the Commission. That result could raise serious practical, legal, jurisdictional, due process, liability, resource, and competition concerns. A better approach is to preserve the STI-GA's existing role, improve information-sharing and coordination with the Commission and appropriate enforcement partners, and ensure that any removal or revocation decisions remain tied to reliable evidence, established procedures, and Commission enforcement action where appropriate.

I. BACKGROUND

The current STI ecosystem was developed by the telecommunications industry as a tool in the fight against illegal robocalls. The STI-GA was established in 2019 under the auspices of the Alliance for Telecommunications Industry Solutions (ATIS), an industry standards organization, which developed the SHAKEN series of standards and proposed the basic construct for the ecosystem that was approved by the Commission's North American Numbering Council (NANC).[2]

[2] 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 industry. ATIS' diverse membership includes key stakeholders – wireless, wireline, and VoIP service providers; equipment manufacturers; broadband providers; software developers; consumer electronics companies; public safety agencies;

The STI-GA is governed by a Board, which includes broad representation from key stakeholders. The STI-GA Board consists of 12 representatives that volunteer time and expertise to support the STI ecosystem. The STI-GA Board is comprised of representatives from a large cable provider appointed by NCTA – The Internet & Television Association; a small cable provider appointed by the American Cable Association; a large independent local exchange carrier (ILEC) appointed by USTelecom; a small ILEC appointed by NTCA – The Rural Broadband Association; a large wireless provider appointed by CTIA; a small wireless provider appointed by the Competitive Carriers Association; a competitive local exchange carrier (CLEC) appointed by INCOMPAS; a regional CLEC appointed by a consortium of the Western States CLEC Coalition, TEXATEL, and others; an over-the-top VoIP provider appointed by the VON Coalition; the founding organizations (AT&T and Comcast); and an at large member (Google). These comments reflect the views of the members of the STI-GA Board.

II. THE *FNPRM* DOES NOT ACCURATELY REFLECT THE ROLE, PURPOSE, AND VALUE OF THE STI ECOSYSTEM

In Section III, below, the STI-GA responds to the specific issues raised in the *FNPRM*. Before turning to those, the STI-GA provides additional context and information about the STI ecosystem and the role and purpose of SHAKEN and the STI-GA. Many of the *FNPRM* proposals, including the proposed enhanced industry investigative and enforcement roles, do not accurately reflect the important but limited role played by STI-GA and STI participants in addressing the larger public challenge in stemming the tide of unlawful robocalls.

The FNPRM Underestimates the Success of the Industry-Led STI Ecosystem by Overestimating its Proper Role. The STI ecosystem has been a success and is working as

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.

envisioned. The industry-led structure has facilitated the successful and efficient rollout of STIR/SHAKEN, resulting in lower implementation costs over other structures. This structure has also allowed the STI-GA to evolve to meet new challenges, creating and updating policies as needed. As was noted during the recent House Hearing on Protecting Communications Networks and Improving Connectivity:

> The increasing deployment of STIR/SHAKEN call authentication technology has further bolstered these efforts. For example, the Industry Traceback Group (ITG) leverages STIR/SHAKEN caller ID authentication information collected from providers to improve the traceback process. STIR/SHAKEN data is collected at each hop in the call path, enabling analysis of signing behavior across providers and helping stakeholders to more quickly identify the source of illegal calls. The continued expansion of authentication technologies has made tracebacks more efficient and more effective, thereby improving the overall enforcement ecosystem.[3]

While the STI-GA agrees with the Commission that there are issues that could or should be addressed to improve the STI ecosystem, many of the *FNPRM*'s proposed solutions – such as tasking the STI-GA with enforcement of the Commission's rules and responsibility to make judgments as to which providers are "unlikely to comply" with the Commission's rules – would create challenges. The STI-GA proposes that, instead of fundamentally changing how the Commission's robocalling rules are enforced, the Commission instead looks to enhance existing procedures and processes, including specifically the Robocall Mitigation Database (RMD).

The FNPRM's Proposals Do Not Fully Align with the Purpose of STIR/SHAKEN. One of the challenges with the *FNPRM* is that it appears to be based on a misunderstanding of the purpose of STIR/SHAKEN. STIR/SHAKEN is designed to provide a cryptographic identity of the originating service provider (OSP), when the call originates in IP, which allows enforcement

[3] Testimony of Kevin Rupy, Partner, Wiley Rein, LLP, before the U.S. House of Representatives Energy and Commerce Committee's Subcommittee on Communications and Technology Hearing on Protecting Communications Networks and Improving Connectivity (July 22, 2026).

agencies (e.g., ITG, the Commission, and State Attorneys General) to better trace illegal calls back to the bad actors responsible for putting them onto the network.

ATIS 1000074 explains that SHAKEN "defines the framework for telephone service providers to create signatures in Session Initiation Protocol (SIP) and validate initiators of signatures" and "defines the various classes of signers and how the verification of a signature can be used toward the mitigation and identification of illegitimate use of national telecommunications infrastructure."[4] The standard goes on to explain that "[u]se of standardized cryptographic digital signatures to validate the originator of a signed identity can provide a verifiable mechanism to identify the authorized originator of a call into the VoIP network with non-repudiation."[5]

The FNPRM Mischaracterizes the STI-GA's Role and Purpose. A significant focus of the *FNPRM* is on the STI-GA's enforcement activities and how these could be enhanced. But the STI-GA was never intended to be, is not structured to be, and cannot easily be changed to be the enforcer of the Commission's robocall rules. From the very inception of this industry-led construct, enforcement of the Commission's rules was viewed to be exclusively the purview of the Commission. The industry standard on which the STI governance structure was based did not envision a role for the STI-GA in exerting regulatory control over entities who use digital certificates, considering that issue out of scope. Rather, the governance structure as designed relies on the Commission's enforcement of its own rules. For example, one of the requirements to get a Service Provider Code (SPC) token is to register in the RMD. In adopting this requirement, it was envisioned that the Commission would actively enforce its RMD rules,

[4] Signature-based Handling of Asserted information using toKENs (SHAKEN), ATIS-1000074.v003, Approved August 16, 2022. This document is available at no charge from: https://access.atis.org/higherlogic/ws/public/download/67436.
[5] *ATIS-1000074v.003, Section 4.*

ensuring that the RMD registrations meet Commission requirements. However, as the Commission's RMD *FNPRM* acknowledges, bad actors and non-compliant providers do appear in the RMD because the Commission does not vet registrants but accepts all filings into the database, weeding out bad actors only after they are in the database.[6]

The STI-GA is intended only to enforce its own objective rules for SPC token eligibility, token revocation, and Certification Authority compliance – a role it does effectively. The STI-GA has investigated every complaint it has received and acted against those that have failed to comply with STI-GA policies or procedures. The STI-GA also stays in close contact with Commission staff, meeting with them regularly to keep them updated on developments and share information on enforcement issues, consistent with STI Policy Administrator (STI-PA) policies.

The FNPRM Fails to Accurately Reflect the Role of Certification Authorities in the STI-Ecosystem. The *FNPRM* also mischaracterizes the role of the Certification Authorities. In STIR/SHAKEN, Certification Authorities assign to service providers the certificates they will use to sign calls. That certificate identifies, with cryptographic authority, the service provider to which it was assigned so that, when it is used to sign a call, the call may be easily traced back to the service provider that signed and provided the level of attestation for the call. The certificate assigned by the Certification Authority does not in any way determine the level of attestation given a particular call. In other words, a Certification Authority has no responsibility for – and indeed no knowledge of or control over – the level of attestation given any call. Further, once a Certification Authority has assigned the certificate to the service provider, the provider, not the Certification Authority, is responsible for managing the use of its certificate. The Certification

[6] *Further Notice of Proposed Rulemaking*, WC Docket Nos. 24-213 and 17-97, CG Docket No. 17-59 (released July 22, 2026) at ¶69.

Authority is not involved with the service provider's use of or general management of its certificate. It is also not in the call flow and does not know how a provider uses its certificate.

*The FNPRM Overstates the Commission's Jurisdiction***.** The Commission's authority is limited to that granted by Congress.[7] Section III(0) below demonstrates that Congress has not authorized the Commission to regulate the STI-GA or ATIS in the manner proposed in the *FNPRM*. For example, the TRACED Act, which the *FNPRM* suggests provides the Commission with the requisite authority,[8] requires "providers of voice service" to implement the STIR/SHAKEN authentication framework. It provides no express grant of authority to the Commission to impose enforcement obligations on a voluntary industry body, like the STI-GA, or a standards organization, like ATIS; and such rules are also beyond the scope of the Commission's ancillary authority.

III. RESPONSES TO SPECIFIC QUESTIONS AND PROPOSALS

In the following sections, the STI-GA addresses specific Commission proposals in the *FNPRM.*

A. Enforcement by the STI-GA Should be Limited to Objective STI Policies

In the *FNPRM*, the Commission proposes that the STI-GA be required to adopt improved policies with "affirmative, effective measures" to prevent: (1) SPC token holders from transmitting calls not compliant with the STIR/SHAKEN authentication framework, the Commission's STIR/SHAKEN rules, or the STI-GA's policies; and (2) Certification Authorities

[7] *See La. Pub. Svc. Comm'n v. FCC*, 476 U.S. 355, 374 (1986) ("[A]n agency literally has no power to act … unless and until Congress confers power upon it…. [W]e simply cannot accept an argument that the FCC may nevertheless take action which it thinks will best effectuate a federal policy. An agency may not confer power upon itself.); *id*. at 374-75 ("To permit an agency to expand its power in the face of congressional limitation on its jurisdiction would be to grant to the agency power to override Congress. This we are both unwilling and unable to do."). *See also Am. Library Ass'n v. FCC*, 406 F.3d 689, 691 (D.C. Cir. 2005) ("[A]dministrative agencies may issue regulations only pursuant to authority delegated to them by Congress.").

[8] *FNPRM* at ¶141.

from failing to comply with those same requirements.[9] The Commission proposes that such policies include enhancements for the issuance and revocation of SPC tokens and the selection and removal of Certification Authorities, including taking greater action to enforce those policies.[10] The STI-GA opposes these proposals.

As explained above, the STI-GA was established as a voluntary, industry-led governance body for the STIR/SHAKEN trust framework, not as a general-purpose investigative or enforcement agency. Its legitimacy and effectiveness depend on neutrality, transparency, broad participation, and non-discriminatory application of consensus-based policies. Forcing the STI-GA to undertake subjective investigations beyond enforcing its own neutral certificate-management policies risks undermining those core principles. The STI-GA should protect the integrity of the STIR/SHAKEN ecosystem by administering only objective rules for SPC token eligibility, token revocation, and Certification Authority compliance.

The STI-GA was formed to support deployment of STIR/SHAKEN by establishing policies that enable eligible providers to obtain SPC tokens and certificates. STIR/SHAKEN allows for the identification of the providers "responsible for the origination of the call onto the IP-based service provider voice network"[11] so that the Commission and other authorized enforcement agencies can take appropriate action. This role is fundamentally narrower and different from the role envisioned by the *FNPRM*, in which the STI-GA would act as the front-line enforcer of a broader range of related Commission rules. The proposed rules would task the STI-GA with vetting the credibility and integrity of upstream providers, as discussed in subsection B below, and with determining whether providers would be "unlikely to comply"

[9] *FNPRM* at ¶43.
[10] *Id.*
[11] ATIS 1000074 v.003 at Section 5.2.3

with requirements in the future, as discussed in subsection C below. These sweeping new subjective front-line enforcement obligations – which are well beyond measuring compliance with neutral policies – would put the STI-GA, and thereby the service providers that serve on its Board, in the position of investigating and potentially excluding competitors from serving as an upstream provider or originating telecommunications traffic throughout the United States.

Placing an industry-led body composed of market participants in charge of subjective determinations that could result in the exclusion of competitors is inappropriate and could raise antitrust issues and competitive concerns.[12] The Commission's proposed structure would create risks of perceived or actual competitive bias. The Commission itself has recognized the risk that similar provider-facing obligations could be abused for anticompetitive purposes.[13]

That is why the SHAKEN specifications limit the STI-GA's role to the implementation of objective criteria that limit discretion and ensure evenhanded treatment. By contrast, a regime that would not only allow, but require industry participants to evaluate subjective factors – such as whether another provider is sufficiently trustworthy, whether its traffic profile is suspicious, or whether its mitigation practices are adequate – could invite disputes, inconsistent treatment, and allegations of competitive abuse.

For these reasons, the STI-GA's role should remain carefully cabined. The STI-GA's existing revocation policy and token-use agreements provide a legitimate basis for policy-based enforcement actions, and those mechanisms should remain focused on the objective application of neutral STI-GA policies and STIR/SHAKEN standards – not broad investigative

[12] *See, e.g., Northwest Wholesale Stationers, Inc. v. Pacific Stationery & Printing,* 472 U.S. 284 (1985) (reasoning that the decision to expel a competitor from an industry self-regulated non-profit cooperative buying association could constitute an unreasonable anticompetitive group boycott or refusal to deal upon a showing of competitive harm).

[13] For example, the Commission noted the need for safeguards to prevent anticompetitive behavior when it privatized its terminal attachment database. *Report and Order*, CC Docket No. 99-216 (released December 21, 2000) at ¶115.

determinations about whether providers are engaged or may become engaged in unlawful robocalling. Broader investigations of unlawful robocalling should remain with the Commission, law enforcement, the traceback process, and other appropriate enforcement channels.

The NANC Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR includes a number of references to the Commission's enforcement role, explaining that the STI-GA "should cooperate with the FCC on any enforcement actions related to misappropriation of the ecosystem."[14] It also notes that the STI-GA must be "[c]apable of working in a 'hybrid' structure with the FCC"[15], which was proposed by ATIS in earlier comments to the Commission. This was the approach followed by the Commission in its privatization of the Administrative Council for Terminal Attachments, which manages the terminal equipment database. Under this approach, the industry manages and oversees the database and procedures related thereto but leaves enforcement of the Commission's terminal attachment rules to the Commission.

The Commission notes that, as contemplated in the *FNPRM*, the STI-GA is supposed to amend policies and procedures "based on actual deployment experience and the response of malicious entities" and that the modifications would be timely "to address potential gaps before they become major issues."[16] The STI-GA notes this process is working as contemplated and the STI-GA is amending its policies and procedures based on real world deployment issues to address evolving challenges. Since its inception in 2019, the STI-GA has developed new policies and updated these policies as appropriate. These include the SPC token Access Policy Version 1.2, STI Certificate Policy Version 1.4.3, SPC token Revocation Policy Version 2.4, SPC token

[14] NANC Call Authentication Trust Anchor Working Group Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR (approved by the NANC on April 27, 2018), Section 3.1.
[15] Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR, Section 3.3.
[16] *FNPRM* at ¶43, n.86.

Reinstatement Policy Version 2.2; Funding Policy Version 7.0 – 2026 Funding; CA Suspension and Revocation Policy v3.0, Conflict of Interest Policy, and Improper Attestation definition. The STI-GA has worked cooperatively with the Commission throughout the creation of its policies to ensure those policies could be supported by, and would support, the Commission. Many of these policies have been updated several times to reflect additional learnings, including input from enforcement agencies. The STI-GA also updated its Operating Procedures to, among other things, streamline the appeals process. These changes have been made in a timely manner. Many of the changes were proactively proposed by the STI-GA Board itself to improve policies and processes to prevent issues.

The Commission proposes that the STI-GA play an active role in obtaining information about providers misusing their SPC tokens and take appropriate action on any information it receives or obtains.[17] The *FNPRM* appears to ignore the effective role that the STI-GA has played in investigating complaints and taking appropriate actions. The STI-GA already actively investigates proposed violations of its policies and takes appropriate action when appropriate. As has been previously reported to the Commission staff, revocations have occurred for other reasons as well, including due to RMD removals and/or deletions, Commission final determinations, improper attestations, and voluntary surrenders.

B. The Commission Should Not Require the STI-GA to Adopt Prescriptive KYUP-Style Vetting Requirements

The *FNPRM* proposes that the STI-GA revise its SPC token access policy to incorporate baseline vetting requirements modeled on proposed know-your-upstream-provider (KYUP) obligations.[18] The STI-GA respectfully submits that this proposal is deeply problematic,

[17] *FNPRM* at ¶48.
[18] *FNPRM* at ¶45.

unnecessary, burdensome, beyond the STI-GA's expertise, and risks subjecting STI-GA Board members to potential antitrust liability and enforcement.

Providers seeking access to the STIR/SHAKEN ecosystem already must pass through multiple existing checkpoints. The STI-GA SPC token Access Policy purposefully ties token access to proof of service provider filings with the Commission and National Exchange Carrier Association (NECA). As a result, a service provider would have had to give false information to other gatekeepers –in a CORES registration, Form 499, or RMD certification; or by providing NECA with false information to acquire its Operating Company Number (OCN).

Thus, the STI-GA – and the process to acquire an SPC token from the STI-GA – is downstream from where vetting should occur. The STI-GA should be able rely on the RMD in particular as an accurate indicator of whether a provider has complied with the Commission's rules because *the Commission* should vet the RMD certifications and mitigation plans for compliance with its rules before accepting them.

The Commission also proposes to require the STI-GA to establish a policy to be applied to both existing Certification Authorities and to entities seeking to become Certification Authorities, and that such policy should follow all of the proposed KYUP information collection and information verification requirements.[19] The STI-GA opposes this proposal, which seems to be based on a misunderstanding of the role of Certification Authorities. The role of Certification Authorities is not to manage how their service provider clients sign calls, or the kinds of calls their clients sign, but to assign a certificate that can be identified as valid for use within the U.S. STIR/SHAKEN ecosystem. Certification Authorities are not, have never been, and never will be in the call flow. They do not sign calls for service providers nor do they track what calls service

[19] *FNPRM* at ¶46.

providers sign. Certification Authorities therefore are not and cannot be responsible for how their clients use the certificates assigned to them. It is thus unreasonable to expect Certification Authorities to undertake an enforcement role.

The Commission also proposes to require the STI-GA to establish a policy for the selection of Certification Authorities, to be applied to both existing Certification Authorities and to entities seeking to become Certification Authorities, and that such policy should follow all of the proposed KYUP information collection and information verification requirements.[20] The STI-GA opposes this proposal, and recommends that any new standards for vetting of Certification Authorities remain calibrated to the actual role Certification Authorities play in the STI ecosystem. Certification Authorities issue certificates under the applicable certificate policy and rely on the STI-PA's token access process. They are not in the call path, do not observe call traffic, and generally are not positioned to determine whether a provider is likely to use certificates to sign illegal calls. Requiring Certification Authorities, or the STI-GA in overseeing them, to make such determinations would create obligations that are not aligned with the information available to those entities or relevant to the effectiveness of the STIR/SHAKEN ecosystem.

Instead of imposing a new industry-funded vetting regime on the STI-GA, the Commission should instead work diligently to address the issues raised in other related robocalling-related proceedings, particularly the KYC, KYUP, and RMD proceedings. If the Commission determines that vetting by the STI-GA is required, the STI-GA could be charged to develop a proposed vetting structure for Commission feedback and approval or provide input and advice in response to a Commission proposal.

[20] *FNPRM* at ¶45.

For example, in the recent RMD *FNPRM*, the Commission proposes a certification process whereby providers would certify to the truthfulness of the information they provide in their RMD registrations, as well as to their compliance with all STIR/SHAKEN attestations. The STI-GA is still studying the RMD proposal but generally agrees with the Commission that this approach would "provide a strong basis for accountability for both facilities-based providers and non-facilities-based providers."[21] Commission implementation of requirements such as these, and their active enforcement, would lead to a safer voice ecosystem for end users, as any provider removed from the RMD is then quickly removed from the STIR/SHAKEN ecosystem by the STI-PA.

C. Forcing the STI-GA to Engage in Speculative "Unlikely to Comply" Evaluations Would be Especially Problematic

The *FNPRM* asks whether the STI-GA should deny SPC tokens or Certification Authority status when there is a reasonable basis to believe that an entity is "unlikely to comply" with STIR/SHAKEN requirements, Commission rules, or STI-GA policies.[22] The STI-GA believes that it is inappropriate to ask the STI-GA to speculate on who may or may not be "likely" to violate any policy, whether it be a standards requirement, STI-GA policy or Commission rule. The STI-GA currently examines complaints or other information indicating that an STI participant is *actually* violating the existing STI-GA policies; and has no objection to continuing to do so. But until such a violation occurs, the STI-GA cannot and should not speculate about whether an entity is *likely* to be a rule-breaker. The risk of competitive harm is too great if all a competitor must do to affect another's operations is to allege that the other company is somehow unlikely to comply with a rule.

[21] RMD *FNPRM* at 20.
[22] *FNPRM* at ¶45, ¶46.

There are also significant practical issues with this proposal. The nebulous nature of an "unlikely to comply" standard would make evaluation difficult. Without objective criteria, how would the STI-GA conclusively determine that an STI participant or applicant is unlikely to comply with a Commission rule? It does not seem likely that the bad actors would make verifiable statements of their intent to violate rules or policies. Instead, the STI-GA would likely need to draw an inference from anecdotal evidence or rely on statements from competitors. If there are specific situations in which the Commission believes a provider that has not yet violated a rule or procedure should be excluded from the STI ecosystem, it should create an internal Commission process to address these situations, outside of the purview of such provider's competitors.

All decisions to deny, suspend, revoke, or remove an STI participant should be based on reliable evidence, clearly defined violations, notice, an opportunity to respond, and an appropriate appeal path. The Commission should not require the STI-GA to exclude entities based on speculative concerns or generalized allegations. While the Commission should not dictate specific binding standards for suspension, the STI-GA would be pleased to undertake substantial consideration of additional Commission guidance on its views of the precise conduct that would warrant denial or removal, the evidentiary showing that should be required, and how the STI-GA should treat unresolved allegations, third-party analytics, traceback information, enforcement referrals, and Commission determinations.

The Commission similarly asks if the STI-GA should also be required to revise its certificate issuance policy so that Certification Authorities have a responsibility to not issue

certificates to entities that are "likely" to use certificates to sign illegal calls.[23] For the reasons discussed above, this proposal is also inappropriate and unworkable.

D. There is No Evidence that Shortening the Certificate Maximum Lifetime Would Strengthen the Authentication Regime

The Commission asks if the STI-GA should be required to adjust its certificate issuance policy, such as by reducing the maximum permissible expiration timeline for a certificate.[24] While the STI-GA is amenable to considering changes to this timeline for good cause, it is unclear what this change would accomplish. The STI-GA has not seen any indication that the current maximum 3-year timeline is inappropriate and has received no complaints about this matter, either formal or informal. Today, only a few of the authorized STI-CAs actually assign certificates with lifetimes as long as three years. In practice, the majority of authorized STI-CAs use a maximum lifetime of no more than one year for certificates they assign, and a number of STI-CAs typically assign certificates with lifetimes as short as seven days. Absent any indication that the current three-year timeline is creating challenges, the STI-GA recommends maintaining the current timeline. If the Commission is aware of data that shows certificates with longer lifetimes being used to mis-attest to calls more frequently than those with shorter lifetimes, the STI-GA believes the Commission should disclose that information.

E. There Is No Evidence that Additional Conflict-of-Interest Policies Would Strengthen the Authentication Regime

The Commission seeks comment on whether the STI-GA should be required to establish a conflict-of-interest (COI) policy governing Certification Authorities' relationships with voice service providers, including when the Certification Authorities are also acting as voice service

[23] *FNPRM* at ¶47.
[24] *FNPRM* at ¶46.

providers, and what that policy should entail.[25] The STI-GA examined the potential for conflicts by Certification Authorities when it established its COI policy and found such measures to be unnecessary. The STI-GA is not aware of evidence demonstrating that Certification Authorities are systematically disregarding the Certificate Policy or enabling illegal calls.[26] Nor is there a demonstrated need for a conflict-of-interest regime based solely on the fact that a Certification Authority may be affiliated with, or provide services to, a voice service provider. The relevant question should be whether the Certification Authority follows the applicable certificate issuance policy, not whether it has a business relationship that is otherwise lawful and transparent.

F. The STI-GA Supports Enhanced Coordination with ITG

The Commission proposes to require the STI-GA to establish formal information sharing arrangements with the ITG and call analytics providers to receive information about specific providers' practices.[27] The STI-GA supports the receipt and sharing of information with the ITG. The STI-GA already collaborates with the ITG and has invited the ITG to present to STI-GA Board. Enhancing this coordination would help ensure that credible information about potential misuse of SPC tokens, improper attestations, or other misconduct reaches the entities with authority to investigate and enforce the law. The STI-GA also can use reliable Commission enforcement determinations and appropriate referrals to take timely action within its own policy framework, including revocation of SPC tokens or coordination concerning certificates where warranted.

By contrast, the STI-GA opposes requiring the STI-GA to establish formal information sharing arrangements with call analytics providers. Unlike the ITG, which is a Commission-

[25] *FNPRM* at ¶47.
[26] To date, the STI-GA has not received a single complaint against one of the providers affiliated with an authorized Certification Authority.
[27] *FNPRM* at ¶48.

recognized part of the STI ecosystem, the STI-GA has no way to ensure that analytics data is accurate. Even if verification is possible, the STI-GA Board does not have the resources to independently verify all data received. This would also push the STI-GA into an investigative and enforcement role that it is not structured to support. If the Commission nonetheless requires the STI-GA to implement such a policy for the receipt of call analytic provider data, the Commission should consider establishing a vetting process to ensure that only trusted analytics providers can supply data to the STI ecosystem and to the Commission.

The Commission also proposes that the STI-GA review and evaluate information it receives from any sources, even in the absence of formal reports.[28] The STI-GA has never refused to consider any reliable source of information, but the STI-GA considers carefully the gravity of revoking a provider's STI certificate. As the STI-GA Board is composed entirely of service providers, it understands the risk of non-compliance, and it is precisely for this reason that the STI-GA closely scrutinizes the information it receives when a complaint is made against a provider. The form used by the STI-GA to collect information on complaints was developed in coordination with the state Attorneys General and was also reviewed by the Commission. Moreover, the STI-GA has received no objections or complaints about the information requested, or our need to identify the party making the complaint. The STI-GA believes the process it developed for revocation and the information it requests to prove improper certificate use is fully warranted. Without a reliable and clear indication that a specific stakeholder is violating STI-GA policy, STI-GA action is inappropriate; otherwise, there is a significant potential for misuse (i.e., false allegations by competitors).

[28] *FNPRM* at ¶48.

G. The Commission Should Adopt the STI-GA's Definition of Improper Attestation

The *FNPRM* proposes to define improper attestation as "any attestation level that does not conform to ATIS-1000074 and the Commission's rules, including any attestation that is inconsistent with the information the voice service provider has, or is required to have, about the call." The STI-GA urges the Commission to defer to the STI-GA's existing definition rather than creating a new one. While the proposed definition is similar to the definition established by the STI-GA, there is one key difference.

The STI-GA Improper Attestation definition, which is incorporated by reference into the STI-GA's SPC token Revocation Policy, defines "improper attestation" as

> [a]ny Attestation level set that does not conform with the industry standards set in ATIS 1000074 (see attachment A). An Improper Attestation includes any call where an originating service provider (OSP) signs a call with a level of Attestation inconsistent with the information it has, or is required to have, about the call.

The proposed Commission definition of improper attestation includes any attestation level that fails to conform not only to ATIS 1000074, but also to the "Commission's rules."[29] Carriers should not be expected to interpret and enforce the entire set of Commission rules every time their customers originate a telephone call.

H. Permanent Revocations Should Only Result from Egregious Conduct

The Commission asks how STI-GA procedures should be enhanced so that providers that violate the STIR/SHAKEN authentication framework, the Commission's STIR/SHAKEN rules, and/or the STI-GA's policies are permanently removed from the STIR/SHAKEN ecosystem.[30]

Banning a provider from the STI-GA should not be done except for egregious situations and should not be done without affording the provider the opportunity to remedy any

[29] *FNPRM* at ¶68.
[30] *FNPRM* at ¶48.

shortcomings. Federal antitrust law requires that a STIR/SHAKEN regime administered by competitors be especially circumspect with respect to any private collective actions that keep a provider out of the market.[31] The intent of STIR/SHAKEN has always been to facilitate the identification of providers originating unlawful calls so that law enforcement, using its appropriate discretion, may target those providers for removal following proper due process. The STI-GA therefore seeks to work with providers to fix signing issues rather than to permanently revoke their tokens. Only when providers refuse to work with the STI-GA does it take steps to revoke their ability to participate in the STI ecosystem, and even then, the STI-GA procedures necessarily permit such providers to appeal a revocation to the Commission.

The *FNPRM* incorrectly suggests that "[d]espite well-known reports that providers are applying improper attestations to calls or otherwise failing to follow the STIR/SHAKEN standards, the STI-GA has reported to Commission staff that it has not permanently revoked SPC tokens of its own accord except for providers that have failed to pay required fees or failed to supply annual FCC Form 499 revenue data."[32] This is not accurate. In regular informal meetings with Commission staff over the past eight years, the STI-GA has provided updates on eight separate investigations brought to the STI-GA by state Attorneys General, including one provider that was permanently revoked by the STI-GA. A second provider was suspended by the STI-GA and then later permanently revoked once the Commission acted against the provider during its period of STI-GA probation. Six other providers worked positively with the STI-GA to identify and fix the issues that caused them to improperly attest to calls.

[31] *See, e.g., Northwest Wholesale Stationers, Inc. v. Pacific Stationery & Printing,* 472 U.S. 284 (1985) (acknowledging that a self-regulated industry group that expels a competitor can be subject to antitrust liability upon a showing of competitive harm).
[32] *FNPRM* at ¶48.

I. The STI-GA Should Not Be Required to Accept Informal and Anonymous Information

The Commission further asks if the STI-GA should be required to relax its reporting policy so that stakeholders can submit information informally or anonymously.[33] The STI-GA opposes requiring it to receive information informally or anonymously, both of which could be problematic.

While the STI-GA understands the interest in allowing "informal" reporting and does its best to be flexible, a minimum amount of information is necessary to pursue a complaint. In addition, as in any other private enforcement regime managed by the competitors of the judged parties, it is essential that the STI-GA's procedures are transparent and afford due process. The formal complaint form ensures that this information is provided and minimizes the need for the STI-GA to delay its investigation while additional information is sought. It is the STI-GA's experience that, without a form, it would take significantly longer to get the required information. There has also been no indication that any provider or other entity has failed to submit information due to the existing reporting policy.

The STI-GA strongly opposes a requirement that it receive or act on anonymous information. Someone submitting information on which it expects the STI-GA to act should be identified. The STI-GA needs to know who is submitting the information so that it can evaluate whether the information can be trusted and whether that entity has a reasonable basis for making any claims. Anonymous complaints or other information would create an opportunity for game playing, allowing providers to anonymously accuse their competitors of wrongdoing. The STI-GA discussed the potential of accepting "anonymous" complaints before it approved the SPC token Complaint form. The Board unanimously decided that anonymous complaints posed too

[33] *Id*.

great a risk for potential abuse by providers to harm competitors.

Information must be submitted through an identified, documented, and authorized process so it can be appropriately triaged, assigned, tracked, escalated, and resolved. Anonymous or informal submissions also create operational and governance risks because they may lack sufficient detail, prevent effective follow-up, delay investigation or remediation, and make it difficult to verify whether the matter has been received, prioritized, or closed. They also undermine accountability.

J. Certification Authorities Should Not Be Evaluated Based on Factors that Are Irrelevant to their Responsibilities in the STI Ecosystem

The Commission proposes that the STI-GA play a more active role in seeking information – and taking action on information it receives – about Certification Authorities failing to follow the STIR/SHAKEN authentication framework, the Commission's STIR/SHAKEN rules, or the STI-GA's policies.[34] The STI-GA has taken an active role in working with Certification Authorities that have violated the Certificate Policy and, as detailed below, has taken action against a Certification Authority that clearly violated the Certificate Policy in its assignment of STI certificates. The STI-GA does not believe modifications to its practices and policies are necessary. The STI-GA would welcome input from the Commission if it becomes aware of Certification Authorities violating the Certificate Policy.

The *FNPRM* incorrectly associates a provider engaging in illegal robocalling with a failure of a Certification Authority or a violation of the Certificate Policy. This association does not exist. A Certification Authority is responsible for appropriately assigning and transmitting the certificate information to each authorized service provider, and for transmitting to the STI-

[34] *FNPRM* at ¶49.

PA information on certificates it has assigned that must be revoked. However, the Certification Authority is not involved in the call flow and therefore has no means of knowing how its provider clients are using the certificates assigned to them. For this reason, the Certificate Policy does not attempt to require an STI-CA to monitor its provider-clients' behavior.

The Commission seeks comment on staff concerns about anecdotal evidence that certain Certification Authorities issue a disproportionate number of certificates used by voice service providers applying improper attestations to their calls.[35] The STI-GA cautions that, when it has received anecdotal information in the past, the information has been based on a misunderstanding of the data or of the Certificate Policy, which resulted in unfounded inferences of malfeasance.

The Commission proposes to require that the STI-GA establish a process to accept information about Certification Authority practices from stakeholders, including a process to regularly obtain information from call analytics providers.[36] The STI-GA questions the benefit of this proposal. As explained above, service provider certificate use is not within the purview of Certification Authorities and so any misuse would not be indicative of non-compliance with Certification Authority practices. The STI-GA also questions what information analytics providers can provide on Certification Authority practices. Analytics providers generally measure and interpret data from the call flow, but Certification Authorities practices are outside that call flow.

Comment is also sought on whether the STI-GA should be required to update its policies to better address the misuse of certificates and the role that Certification Authorities may play in

[35] *Id*.
[36] *FNPRM* at ¶49.

such misuse, and if so, how.[37] Certification Authorities are generally not involved in service provider use of certificates. A Certification Authority has no inherent means of knowing how its clients are using the certificates they assign. In the STIR/SHAKEN ecosystem, the Certification Authority has one role in the area of enforcement – to respond to an STI-PA request to identify a certificate it has assigned to a service provider that either the STI-PA or STI-GA has determined to revoke. This is necessary so that the STI-PA may add that certificate to the Certificate Revocation List. If the Commission has any evidence of certain authorized Certification Authorities being tied to a large number of illegal calls through the certificates they have assigned, the STI-GA would encourage the Commission to share such information with the STI-GA. It is in the interest of the STI-GA and its authorized Certification Authorities to work in cooperation with law enforcement to address these issues.

The Commission asks whether the STI-GA has established adequate steps providers must take when they are issued certificates from a Certification Authority that was subsequently removed.[38] The STI-GA believes that it has established adequate steps for such providers. In 2025, one of the authorized STI-CAs exited the ecosystem. This move was made voluntarily, not as a result of any malfeasance. Even so, the STI-GA made sure that the more than 100 providers served by that STI-CA had ample time to move their services to another of the authorized STI-CAs. Commission staff were informed throughout this process.

K. Sufficient Time Must Be Provided for STI-GA Action

1. More than Six Months Would Be Required for Implementation

The Commission proposes that the enhanced policies proposed in the *FNPRM* be applied to existing SPC token holders and existing Certification Authorities within six months after any

[37] *Id*.
[38] *Id.*

adopted rules take effect. Six months is insufficient time to develop, adopt, and implement the necessary policies and to take other necessary actions for an existing ecosystem that has over 2,200 providers (and is growing). There are many steps that would be required before the policies could be applied, and while some steps can be taken simultaneously, it will still take substantially longer than six months.

First, the STI-GA Board must update its policies or adopt new policies to reflect the final rules. Given the number of policies that may have to be modified or created, this could take some time and may involve both the STI-Board and its Technical Committee, as well as collaboration with the Commission.

Before the STI-GA could implement the new rules, it would also need to determine if its current structure – a voluntary Board of twelve members who meet twice per month – can support such an effort moving forward. The STI-GA may determine that the current STIR/SHAKEN governance structure (STI-GA, STI-PA and STI-CAs) needs to be altered to accommodate a much heavier role. An STI-GA role that includes investigation and law enforcement responsibilities delegated to it by the Commission would almost certainly require a different Board structure and support staff.[39]

The STI-GA may also need to develop an RFP to select a third-party vetter or vetters. This process could take many months. When the STI-GA selected the STI-PA, the RFP process took six months, and then building and testing the system took an additional seven months. While STI-GA does not expect that it would take seven months to build and test vetting processes, it would still take more than six months to issue the RFP, select the vendor, and launch the service. Once a vetter has been selected/hired, the vetting of the more than 2,200

[39] There is also a question as to whether the existing STI-GA Board representatives and associations would still want to participate in these new enforcement responsibilities given the risk and workload required.

authorized service providers, as well as any new service providers seeking authorization, would also take significant time.

2. The STI-GA Must Have Sufficient Time to Consider Input

The Commission seeks comment on whether the STI-GA should be required to review and act on any information it receives or obtains about voice service providers or Certification Authorities within a specific timeframe and asks if ten business days is sufficient.[40] The STI-GA takes its responsibility as manager of the ecosystem very seriously and works diligently to review and resolve complaints as soon as possible. However, it is not possible for the STI-GA Board to meet a specific deadline in all situations. The timeline depends on the complexity of the allegations, the completeness of the information received, the need to seek a response from the affected entity, the availability of Board members and support resources, and the risk of erroneous action.

In some cases, it takes significant time to work with the complainant or information provider before the information is sufficiently complete and comprehensible to be reviewable or actionable by the STI-GA Board. Given the voluntary nature of the STI-GA Board, the availability of Board members may be challenging. For these reasons, an inflexible, one-size-fits-all mandatory ten-business-day action period would be inappropriate and counterproductive, and there is no evidence that imposing a specific time limit on the STI-GA is necessary.

The Commission itself has acknowledged the need for sufficient time to review and resolve appeals. In the Commission's August 2021 *Third Report and Order (Third R&O)* regarding appeals of providers that had been "aggrieved" by the STI-GA, the Commission gave itself 180 days to render decisions. The Commission rejected a recommendation for a much

[40] *FNPRM* at ¶50.

shorter 30-day deadline, explaining that that the commenter "does not explain how the Bureau can adequately account for the potential novel and complex factual issues each appeal could raise in 30 days."[41]

3. The STI-GA Should Not Be Required to Implement an Immediate Suspension Policy

The Commission asks whether the STI-GA should be required to adopt a policy to immediately suspend an SPC token or Certification Authority when presented with evidence of egregious activity, after which it could conduct a more thorough review and final determination.[42] The STI-GA believes that an "immediate suspension" policy would be inappropriate. Even when presented with evidence of egregious activities, the STI-GA Board would still need time to verify the accuracy and veracity of the evidence. This is particularly important where competitors that would gain a competitive advantage if the suspension were granted may be the source of evidence.

Instead, the STI-GA believes that it should continue to follow its existing Suspension and Revocation Policy, which provides an opportunity for providers to defend or explain their actions should a complaint be filed against them. This process, which was developed with input from Commission staff, has been used successfully to address compliance issues and to correct how specific providers act within that ecosystem. The STI-GA believes that removal from the STI ecosystem should be a last resort for intentional violations, not a routine response to untested allegations. The goal of STIR/SHAKEN is to help identify Originating Service Providers and the calls they place onto the IP-based voice service provider network, and support accountability, not to exclude providers from the voice ecosystem without due process. If providers are not signing

[41] *Third R&O*, WC Docket No.17-97 (August 16, 2021).
[42] *FNPRM* at ¶50.

calls, they cannot be readily identified by law enforcement bodies through traceback efforts that assist as the Attorneys General and Commission.

While such caution is prudent and necessary when the STIR/SHAKEN regime is being administered by a group of private competitors, the Commission can use any legal means at its disposal to effectuate its policy objectives by immediately suspending or removing a provider from the RMD, whereupon the STI-GA will revoke the provider's certificates following a process the STI-GA recently developed in cooperation with Commission staff.[43] The STI-GA would then contribute any information it has about the provider to the Commission's review of its own decision to remove the provider from the RMD.

L. There Are Significant Implementation Barriers

The Commission seeks comment on any barriers to the STI-GA following any of the requirements proposed in the *FNPRM*.[44] As explained above, there are many barriers, from practical concerns over how the STI-GA could identify providers "unlikely to comply with Commission rules," to how the STI-GA would evaluate anonymous data or unverified analytics data, etc., to increased costs, to significant jurisdictional and competitive concerns.

The Commission also asks if there are steps the Commission could take to facilitate information sharing.[45] The STI-GA urges the Commission to better enforce its existing robocalling rules and to enhance the RMD process so that, when it finds falsified information in the RMD, it suspends or revokes the RMD registration. This will prompt the STI-GA to move quickly to revoke that provider's access to SPC tokens and the STI certificates needed to sign

[43] This process is attached to the STI-GA's SPC token Revocation Process. It is titled "SPC Token Revocation for FCC Ordered RMD Removals." This process of STI-PA revocation following Commission removal of a provider from the RMD takes roughly ten business days to complete.
[44] *FNPRM* at ¶51.
[45] *FNPRM* at ¶51.

calls. In fact, the STI-GA is pleased to see that the Commission has adopted a rulemaking focused on improving the effectiveness of the RMD by strengthening filing obligations.[46]

Under the current SPC token Access Policy, no bad actor can gain STI-PA authorization until they first gain entry to the Commission's Robocall Mitigation Database (RMD). Therefore, making service provider access to the RMD an application process, rather than a no-questions asked registration process, makes all steps down the line – including STI-PA authorization – more secure.

The STI-GA urges the Commission to focus first on the RMD improvements before imposing new enforcement responsibilities on the STI-GA. The STI-GA supports the Commission's efforts to ensure that providers' RMD filings are accurate, complete, and up to date; ensure that only legitimate, transparent and accountable providers can enter or remain in the database; strengthen RMD filing obligations; and introduce new tools designed to prevent bad actors and non-compliant providers from entering or remaining in the RMD.[47]

The Commission also seeks input on whether and for what reasons the STI-GA may be deterred from obtaining information or enforcing its policies, such as resource or liability concerns.[48] Those concerns are both significant. Under the Commission's proposals, the STI-GA's role would expand from the enforcer of STI-GA policies and procedures to the enforcer of the Commission's robocalling rules and the determiner of who is not likely to comply with Commission rules. It is a broad role that would require new resources and staff, increase costs to participants, and impose significantly more risk to the STI-GA, ATIS, STI-GA Board members,

[46] *Further Notice of Proposed Rulemaking* in WC Docket Nos. 24-213 and 17-97, CG Docket No. 17-59(July 23, 2026.)
[47] Commission Open Meeting, July 22, 2026, Recorded Statement of Merry Wulff, Attorney Advisor, Competition Policy Division, Wireline Competition Bureau.
[48] *FNPRM* at ¶51.

and those Board members' employers.

The *FNPRM* also asks whether the STI-GA should be permitted to use third parties to perform some or all of the required vetting.[49] Assuming such vetting is mandated, the STI-GA should be given flexibility in how it would handle it. The STI-GA is not currently staffed to perform the vetting proposed in the *FNPRM* and should have the opportunity to decide whether to hire staff or a third-party vetter. The Commission should not prescribe how these responsibilities are performed and should leave them to the STI-GA's discretion.

The Commission asks whether the costs associated with obtaining the information proposed in this *FNPRM* can be incorporated into other STI-GA operational expenses that are paid for by fees from providers obtaining SPC tokens.[50] The STI-GA notes that it would necessarily plan to incorporate these expenses into other STI-GA operational expenses and recoup them from STI participants as it does with other operational expenses. The STI-GA urges the Commission to consider the timing of any new responsibilities to allow associated expenses to be recouped in a timely manner and without the need for a mid-year special assessment. Because STI participation fees are collected on an annual basis with invoices issued on November 1, any requirements that would increase expenses significantly for a subsequent year, as the Commission's proposals likely would, must be understood well in advance of the invoice date, preferably by the beginning of a third quarter of a calendar year.

M. A Safe Harbor Is Essential

The Commission asks if there is a safe harbor the Commission can grant to the STI-GA for denials and revocations.[51] Whatever the Commission does in response to comments

[49] *FNPRM* at ¶51.
[50] *FNPRM* at ¶51.
[51] *FNPRM* at ¶51.

submitted on the *FNPRM*, the Commission should create a safe harbor. That safe harbor should be structured to protect the STI-GA Board representatives, their companies and supporting associations, ATIS and its employees, and the vendors that are selected by ATIS to perform key roles (including the STI-PA). Given the broad role proposed for the STI-GA, a safe harbor is necessary to mitigate the risk that would be associated with greater enforcement responsibilities. The STI-GA remains concerned that a Commission safe harbor may not fully protect such persons and companies from antitrust liability to which they may be exposed by the Commission's mandates described in the *FNPRM*, but if such mandates are nonetheless imposed, the STI-GA urges the Commission to state on the record that such parties' actions in attempts to comply with the Commission's rules are entitled to immunity under the federal antitrust laws.[52]

N. Appeals of Final STI-GA Revocation and Removal Decisions to the Commission Should Be Permitted

The Commission proposes to allow parties to appeal STI-GA decisions to the Commission.[53] Noting that it has already established a process for voice service providers to appeal token revocation decisions to the Commission, the Commission also asks if it should establish a similar process for entities removed as Certification Authorities, as well as for when providers are denied SPC tokens and entities denied as Certification Authorities in the first instance.[54]

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[52] This would include, as applicable (1) the Noerr-Pennington Doctrine (immunity for acts designed to influence the legislature, administrative rulemaking, enforcement, and ministerial filings, and the courts), *see, e.g., Geomatrix LLC v. NSF International,* 82 F.4th 466 (6th Cir. 2023) (applying doctrine to a standard setting organization where alleged harm came from government action); (2) Implied Immunity (*see, e.g., Credit Suisse Secs. (USA) LLC v. Billing,* 551 U.S. 264, 270-71 & 275-78) (2007)) (holding that the securities laws preempt the antitrust laws if the challenged conduct lies squarely within an area that the securities laws seek to regulate, a regulatory authority exists to supervise the conduct at issue, the regulatory entity exercises its authority, and applying both the securities and antitrust laws would produce conflicting guidance); and (3) Regulatory Compliance (where otherwise anticompetitive actions were carried out in good faith and justified by the regulatory scheme, *see, e.g., Southern Pacific Comms. Co. v. American Tel. and Tel. Co.*, 740 F.2d 980, 1010 (D.C. Cir. 1984)).
[53] *FNPRM* at ¶52.
[54] *Id*.

The STI-GA supports the Commission allowing Certification Authorities to appeal revocations in a process similar to token revocation decisions. However, aggrieved entities should be required to exhaust the STI-GA appeal process before appealing to the Commission.

On the other hand, the Commission should not entertain appeals of STI-GA decisions *declining* to revoke an SPC token, remove a Certification Authority, or initiate an investigation.[55] First, such appeals could create competitive issues, as an appeal of inaction would likely be coming from a competitor. This creates a substantial incentive for game-playing by bad actors. Second, the STI-GA complaint process properly protects confidential information received during an investigation. Once a complaint has been received by the STI-GA, the information received during the investigation is kept confidential until a decision is made by the STI-GA. If a decision is made that the complaint had no merit or that there was otherwise no violation of STI-GA policies or practices, the STI-GA decision would not include detailed information about any unsubstantiated or unproven allegations to avoid unnecessarily damaging the provider's reputation. Therefore, there would likely be no basis on which to support an appeal. Importantly, the lack of a formal appeal route would not preclude any entity from contacting the Enforcement Bureau directly to raise its concerns, nor that Bureau investigating and addressing those concerns.

The *FNPRM* also seeks input on whether the STI-GA should be required to respond to stakeholders that submit complaints if it declines to act.[56] The STI-GA already responds to anyone who submits a complaint, including complaints on which it declines to act. In addition, the STI-GA works with those filing complaints to ensure that the complaint is complete and to gather additional information from the complainant as necessary. The proposed rule is therefore

[55] *FNPRM* at ¶52.
[56] *Id*.

unnecessary.

O. The STI-GA Welcomes Continued Collaboration with the Commission

The Commission proposes that the STI-GA report to the Commission on a quarterly basis information about its enforcement activity, including complaints it has received, investigations it has initiated or concluded, and decisions concerning SPC token revocations and Certification Authority removals, including any reports documenting the STI-GA's final determinations.[57] The STI-GA has shared relevant information with the Commission, so while no rule is needed to compel such reporting, quarterly reporting would be reasonable if the reporting obligation is tailored, practical, and focused on information that is useful to the Commission. Collaboration will be most effective if the reports are part of a two-way process in which the Commission also shares concerns, enforcement priorities, and relevant information with the STI-GA. The STI-GA has met with the Commission regularly (more than once a quarter) since its inception and has consistently updated the Commission on developments, including enforcement activities. It looks forward to continuing this dialogue with the Commission.

P. The Commission's Asserted Legal Authority for These Proposals Is Insufficient

The Commission seeks comment on its view, as explained in the *FNPRM*, that the TRACED Act and section 251(e) of the Act and the Truth in Caller ID Act provide it with authority to adopt its proposals related to the STI-GA,[58] or that it has such authority under the Commission's ancillary authority.[59] These do not provide the Commission with authority for the proposals addressed above.

[57] *FNPRM* at ¶53.
[58] *FNPRM* at ¶¶141-142.
[59] *Id.* at ¶143.

The Commission's authority is limited.[60] The *FNPRM* proposes to impose a wide variety of new obligations on the "governance authority" STI-GA. But the STI-GA has no legal existence – it is an industry group formed under the auspices of ATIS – and thus cannot be regulated by the Commission.[61] Beyond that, the statutory bases on which the *FNPRM* relies do not authorize the Commission to regulate a private standards organization like ATIS or the individual members of the STI-GA board. Under Section 251(e) of the Communications Act and Section 227(e) of the Truth in Caller ID Act, the Commission has broad authority over common carriers and numbering resources in specific contexts, but neither provision supports direct regulation or oversight of the STI-GA. Nor can such regulation of an otherwise-unregulated entity be considered "ancillary" to those congressional grants of authority.

1. Section 251(e) Concerns Numbering Administration and Does Not Grant the Commission Oversight Authority of the STI-GA

Section 251(e) gives the Commission "exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States" and authorizes the Commission to "create or designate one or more impartial entities to administer telecommunications numbering and to make such numbers available on an equitable basis."[62] That provision is directed to numbering administration. It authorizes the Commission to oversee the allocation and administration of numbering resources and to designate entities to administer numbering resources. But the STI-GA is not involved in the allocation of numbers. It does not assign telephone numbers, administer numbers, or make numbers available to providers or end users. Its role is limited to governance of the STIR/SHAKEN authentication ecosystem –

[60] *See La. Pub. Svc. Comm'n v. FCC*, 476 U.S. 355, 374 (1986); *Am. Library Ass'n v. FCC*, 406 F.3d 689, 691 (D.C. Cir. 2005).
[61] Although Section 64.6300 of the Commission's rules currently refers to the STI-GA as the "entity" that establishes policies governing use of Service Provider Code (SPC) tokens, that statement is in error and should be corrected.
[62] 47 U.S.C. § 251(e).

including objective policies related to access to SPC tokens – not administration of the North American Numbering Plan. And while the Commission has previously concluded that Section 251(e) authorizes it to impose numbering-related obligations on *voice service providers*,[63] these obligations were directed at voice service providers and other entities ***subject to the Commission's regulatory jurisdiction*.** The *FNPRM* does not explain how Section 251(e) extends the Commission's jurisdiction to direct oversight of the STI-GA – an industry-led governance body that neither assigns nor administers numbering resources and does not originate, transmit, or accept call traffic.

2. Section 227(e) Targets Spoofing and Misleading Caller ID Practices, Not Parties that Are Not in the Call Flow

Section 227(e) makes it unlawful for any person, "in connection with any voice service or text messaging service, to cause a caller identification service … to knowingly transmit misleading or inaccurate caller identification information with the intent to defraud, cause harm, or wrongfully obtain anything of value."[64] This section gives the Commission authority to promulgate rules concerning persons or entities that spoof calls using inaccurate caller ID information, or that cause misleading caller ID to be transmitted.[65] But the STI-GA is not in the call flow at all – it does not spoof calls or cause caller identification services to transmit misleading or inaccurate caller ID information; it does not originate calls, transmit calls, or insert caller ID information into calls. While the STI-GA is engaged in efforts to *mitigate* the effects of spoofing, that does not make it subject to Section 227(e) because it cannot be said to "cause"

[63] This has included prohibiting certain providers from accepting traffic from entities not listed in the RMD, preventing certain traffic from entering providers' networks, and restricting calls that spoof invalid, unallocated, unused, or otherwise unauthorized telephone numbers. [63] *FNPRM* at ¶62. *See also in re Advanced Methods to Target and Eliminate Unlawful Robocalls*, Fourth Report and Order, CG Docket No. 17-59, ¶ 37 (rel. Dec. 30, 2020); *In re Call Authentication Trust Anchor*, Second Report and Order, WC Docket No. 17-97, ¶ 99 (rel. Oct. 1, 2020).
[64] 47 U.S.C. § 227(e).
[65] 47 U.S.C. § 227(e). *See also United States v. Rhodes*, 2026 WL 1662067 (9th Cir. June 9, 2026).

misleading or inaccurate caller ID information to be transmitted.

3. The Commission's Ancillary Authority Does Not Reach a Non-Service Provider such as the STI-GA

The Commission proposes invoking its ancillary authority under Section 4(i) to support its new rules.[66] But as the Commission's own analysis shows, that ancillary authority is limited here to "adopt[ing] rules with respect to *voice service providers* that have not been classified as common carriers."[67] The Commission appropriately does not propose relying on its ancillary authority to justify regulating a *non-provider* like STI-GA. Nor could it use Section 4(i) to affect such a drastic expansion of its defined jurisdiction.[68]

[66] *FNPRM* at ¶143.
[67] *Id.* (emphasis added).
[68] *See Am. Library Ass'n v. FCC*, 406 F.3d 689, 700–05 (D.C. Cir. 2005) (holding that ancillary jurisdiction requires both Title I coverage and a reasonable connection to the FCC's statutorily mandated responsibilities; FCC lacked authority to regulate digital television receiver devices after broadcast transmission was complete).

IV. CONCLUSION

While the Commission lacks authority to impose the proposed rules on the STI-GA, there are viable, better alternatives available to address the governance concerns raised in the *FNPRM*. Instead of attempting to expand its authority, the Commission should use its existing authority in appropriate ways. Specifically, the Commission could adopt a coordinated enforcement framework that preserves the STI-GA's role while improving the flow of reliable information. Under that framework, the Commission would adopt the STI-GA's definition of improper attestation and define other relevant violations, enhance and enforce its RMD[69] and robocalling rules directly against providers – including the proposals in the recently released RMD *FNPRM* – and share appropriate enforcement determinations or referrals with the STI-GA. The STI-GA, in turn, would maintain and refine policies for SPC token access and revocation, coordinate with the STI-PA and Certification Authorities, and act promptly when reliable evidence or Commission action establishes that revocation or other ecosystem action is warranted.

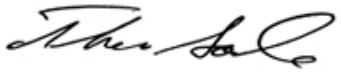
This approach would strengthen enforcement while respecting institutional roles. It would avoid duplicative vetting, reduce the risk of erroneous or anticompetitive outcomes, preserve industry participation in STIR/SHAKEN governance, and ensure that enforcement decisions remain within the governmental bodies authorized and equipped to make them.

The Commission should not implement proposals that would transform the STI-GA from a limited-purpose implementer of objective industry standards into a quasi-governmental robocall police force with broad discretionary and subjective authority to immediately suspend a competitor's access to the U.S. telecommunications market. The Commission should instead

[69] As noted above, the STI-GA urges the Commission to first evaluate the effectiveness of the improvements to the RMD that were proposed in a separate rulemaking, such as the vetting of proposed RMD entries prior to their acceptance into the database.

preserve the existing industry-led governance model, enhance coordination and information sharing, rely on Commission enforcement determinations for enforcement-driven ecosystem action, and provide clear standards, adequate time, sufficient resources, and strong liability protection for any new responsibilities. This balanced approach aligns with the Commission's jurisdiction, will better advance the Commission's consumer-protection objectives, and will maintain the stability, fairness, and effectiveness of the STIR/SHAKEN ecosystem.

Respectfully submitted,



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