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
JOINT IP NETWORK-TO-NETWORK TASK FORCE

The Joint IP Network-to-Network (IP-NNI) Task Force 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. In the *FNPRM*, the Commission addresses a number of issues related to the Signature-based Handling of Asserted information using toKENs (SHAKEN) series of standards that were developed by the IP-NNI Task Force. In these Comments, the IP-NNI Task Force respectfully urges the Commission not to require service providers to incorporate requirements that are unrelated to identifying the end user or upstream service provider into the attestations requirements of, or are otherwise inconsistent with, ATIS-1000074, *Signature-based Handling of Asserted information using toKENs (SHAKEN).*

I. Background/Introduction

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and

communications technologies. ATIS' diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless, wireline, and VoIP service providers; equipment manufacturers; broadband providers; software developers; consumer electronics companies; public safety agencies; and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees, including ATIS Packet Technologies and System Committee (PTSC).

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

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

The IP-NNI Task Force identifies baseline features that should be common to all IP-NNI implementations for voice service. The IP-NNI Task Force also defines a common set of

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

- Signature-based Handling of Asserted information using toKENs (SHAKEN) (ATIS-1000074.v003), an industry framework for managing and deploying Secure Telephone Identity (STI) technologies with the purpose of providing end-to-end cryptographic authentication and verification of the telephone identity and other information in an IP-based service provider voice network.
- SHAKEN: Governance Model and Certificate Management (ATIS-1000080.v006), which identifies the key roles/functions involved in distributing and managing SHAKEN certificates.
- Technical Report on SHAKEN APIs for a Centralized Signing and Signature Validation Server (ATIS-100082), which provides a Technical Report on a SHAKEN APIs used to support a Centralized Signing and Signature Validation Server.
- Technical Report on a Framework for Display of Verified Caller ID (ATIS-100081), which provides a framework for signaling verified Caller ID information from the network to a User Equipment (UE) and displaying the information on the UE in a uniform manner, independent of technology.
- Signature-based Handling of Asserted information using toKENs (SHAKEN): Calling Name and Rich Call Data Handling Procedures (ATIS-1000094.v002), expands the SHAKEN framework, introducing mechanisms for authentication, verification, and transport of calling name as well as other enhanced caller identity information (e.g., images, logos) and call reason, and describes how they are handled in various call origination and termination scenarios.

II. Comments

In the *FNPRM*, the Commission proposes to incorporate its Know Your Upstream Provider (KYUP) and Know Your Provider (KYC) rules into its SHAKEN attestation requirements.[1] Proposed Section 64.6301 of the Commission's rules would require voice service providers to "have a direct, authenticated relationship with the customer associated with the call

[1] *FNPRM* at ¶62.

and be able to identify the customer by satisfying the requirements in §64.1200(n)(4)-(5)."[2] Section 64.1200(n)(4) requires voice service providers to "[t]ake affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic."[3] Section 64.1200(n)(5) in turn would require voice service to providers to "take affirmative, effective measures to prevent any voice service provider directly upstream from it, foreign or domestic, from using its network or services to transmit illegal calls, including knowing its upstream voice service provider."[4] The IP-NNI Task Force urges the Commission not to require service providers to incorporate requirements that are unrelated to identifying the end user or upstream service provider into the attestations requirements of, or are otherwise inconsistent with, ATIS-1000074.

ATIS-1000074 defines the levels of attestation to be populated in the service-provider-signed "shaken" PASSporT. The three levels of attestation defined in the standard indicate the extent to which the signing provider has ascertained the identity of the calling entity and whether the caller ID telephone number being used for the call is associated to that entity.[5] The attestation claim ("attest") permits the passing of information to a Relying Party based on what a signing service provider knows about the originator of the call and the originator's verifiable association to the calling number.[6] Portions of the existing KYC rule and proposed KYUP rules are unrelated

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[2] *FNPRM*, Appendix A, Sections 64.6301(b)(1)(ii) and (2)(ii).
[3] 47 CFR §64.1200(n)(5).
[4] 47 CFR §64.1200(n)(4), (5).
[5] Signature-based Handling of Asserted information using toKENs (SHAKEN) (ATIS-1000074.v003), Section 5.2.4 (defining three levels of attestation: (1) full attestation; (2) partial attestation; and (3) gateway attestation).
[6] For a more expansive description of possible ways of determining the identity of a "caller" and their verifiable association to the calling telephone number, see Appendix A of "Best Practices for the Implementation of Call Authentication Frameworks" developed by the Commission's North American Numbering Council's Call Authentication Trust Anchor Working Group, available at https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf.

to identifying the customer, whether an end user or upstream service provider, as incorporated in these attestation level definitions. In particular, the requirements to take effective measures to prevent illegal calling, monitor upstream service providers, and discontinue service to upstream service providers found to be transmitting illegal calls are not directly related to the identification process.

While the caller and signing service provider identity information from the PASSporT may be inputs to an analytics function at the terminating service provider to allow that provider to assess reputation and other characteristics of the calling entity,[7] the PASSporT information, including the attestation level, does not itself convey intent, reputation, or the likelihood a particular call is illegal in some way. It cannot therefore be used to conclude that the upstream provider "is likely to use or is using its network or services to transmit illegal calls," as proposed in the *FNPRM*.[8] An "A" attestation level, for example, does not itself indicate the caller has a good reputation, only that the originating service provider has a direct authenticated relationship with the customer, can identify the customer, and has established a verified association with the telephone number used for the call.[9]

To the extent that the Commission seeks to adopt such criteria, it could do so without obscuring the intended context of the attestation signal populated by the originating service provider and received by the terminating service provider. The proposed new criteria would, in the IP-NNI Task Force's opinion, be better incorporated into service provider administrative procedures and/or the call flow through other means.

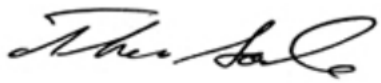
[7] ATIS-1000074.v003, Section 4.1.1.
[8] *FNPRM* at ¶25.
[9] ATIS-1000074.v003, Section 5.2.4.A.

II. CONCLUSION

The IP-NNI Task Force appreciates the opportunity to provide its input to the *FNRPM* and urges the Commission to consider the input above. The IP-NNI Task Force urges the Commission not to require service providers to incorporate requirements that are unrelated to identifying the end user or upstream service provider into the attestations requirements of, or are otherwise inconsistent with, ATIS-1000074 but to instead maintain the attestation signal as an indicator of customer authentication and calling telephone number authorization status.

The IP-NNI Task Force welcomes further collaboration with the Commission regarding ways to improve caller identity information and increase accountability and compliance.

Respectfully submitted,



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