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 CROSS BORDER CALL AUTHENTICATION GOVERNANCE AUTHORITY

The Alliance for Telecommunications Industry Solutions (ATIS) on behalf of the Cross Border Call Authentication Governance Authority (CBCA-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] The CBCA-GA applauds the Commission's efforts to address illegal robocalling and to ensure that the SHAKEN ecosystem remains effective. The CBCA-GA urges the Commission to support the Cross Border Call Authentication (CBCA) and to require service providers to accept foreign originated call attestations only from providers that have been approved by the Secure Telephone Identify Governance Authority (STI-GA).

[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*).

I. INTRODUCTION AND BACKGROUND

The CBCA-GA[2] is a non-jurisdictional governance authority with a structure similar to the STI-GA. The CBCA-GA's goal is to prevent fraudulent and spoofed phone calls originating from outside a country's borders, by establishing a secure root of trust for call authentication. At the core of the CBCA-GA is the Call Authentication Trust Anchor, which is implemented via the issuance of digital certificates to authorized service providers. These certificates are used to authenticate call information, allowing terminating providers to verify that a caller ID is legitimate and has not been tampered with during transmission. Like the STI-GA, the CBCA-GA uses public key infrastructure (PKI) to ensure that only trusted entities can authenticate calls.[3]

The CBCA-GA Certificate Policy addresses procedural and operational considerations that must be followed to be approved by the CBCA Policy Administrator (CBCA-PA) to serve as trusted CBCA Certification Authorities (CBCA-CA) in the CBCA ecosystem. It sets forth the business, legal, and technical requirements for approving, issuing, and managing certificates, including SPC token validation and Certificate Revocation List management while providing associated trust services for all participants. Additionally, the CBCA-GA has adopted policies to address service provider token access, revocation and reinstatement as well as the suspension and reinstatement of CBCA-CAs and guidance on improper attestation.

The industry-led Oversight Committee includes CBCA Founding Members Google, Microsoft, RingCentral and Bandwidth. The Oversight Committee: (1) establishes criteria for participation and other policies; (2) maintains these policies, revising or expanding as needed so

[2] In these comments, the term CBCA-GA is used to describe the governance structure proposed by ATIS to distinguish this structure from the cross border call authentication standard (ATIS-1000087 – Mechanism for Initial Cross-Border Signature-based Handling of Asserted information using toKENs (SHAKEN). The CBCA-GA includes the CBCA Governance (ATIS) and the CBCA Oversight Committee.

[3] In August 2024, a successful CBCA trial was conducted with Bandwidth and Microsoft.

that they can continue to effectively address challenges; (3) makes necessary revocation and reinstatement decisions; (4) resolves appeals; and (5) assists with monitoring and enforcement mechanisms to identify and appropriately address the misuse of certificates.

The CBCA-PA serves a similar role to the STI-PA. Among other things, the CBCA-PA supports the CBCA-GA's evaluation of service provider applications for participation in the Global STIR/SHAKEN community to determine if they are eligible to join based on CBCA-GA criteria. It also manages the registration portal, onboards service providers, and maintains the CBCA Certificate Revocation List, Trusted CBCA-CA List and Cross-Border Trust List, and Service Provider List.

The CBCA-GA structure also includes participation by CBCA Certificate Authorities (CBCA-CAs). Like with the STI-CAs, CBCA-CAs will issue certificates to approved service providers after verifying the validity of providers' SPC tokens. Additionally, CBCA-CAs are required to maintain a certificate repository with public certificates and advise the CBCA-PA if any certificates need to be revoked.

Participation in the CBCA initiative is open to all verified international service providers that pass comprehensive vetting requirements.

II. COMMENTS

A. The Commission Should Support Cross Border Call Authentication

The Commission seeks comment in the *FNPRM* on how its proposals will advance or hamper ongoing efforts to achieve Cross Border Call Authentication (CBCA), and whether it should do more to support that effort.[4] The CBCA-GA urges the Commission to support CBCA.

[4] *FNPRM* at ¶127.

As Congress recognized in the TRACED Act, enabling providers to verify that the calling number displayed is actually associated with the caller and provider can reduce illegal calling and greatly assist traceback efforts. And, because illegal calling is not confined by national borders, the most effective response is a framework that permits trusted providers to exchange authenticated call information across jurisdictions while preserving the accountability, vetting, and traceback functions that make caller ID authentication useful. The CBCA-GA offers a targeted and technically sound approach to this problem by enabling end-to-end verification of calls in an all-IP environment, including calls that originate in countries that have not yet deployed a national SHAKEN framework.

The CBCA-GA also facilitates the use of tracebacks to identify foreign intermediate providers and the foreign originating providers at the beginning of the call path.[5] Thus, the CBCA-GA also creates incentives for foreign providers that send traffic to the U.S to participate in a vetted trust framework. The alternative – treating foreign-originated traffic as inherently untrusted or relying primarily on broad blocking rules – risks harming lawful international communications, including calls from global businesses, multinational enterprises, travelers, and consumers with cross-border relationships.

The Commission should encourage CBCA because it advances the same core objectives that underlie the domestic STIR/SHAKEN framework: restoring trust in voice communications, improving the reliability of caller ID information, and giving downstream providers, analytics engines, and enforcement authorities better information about the entities responsible for placing calls onto the network. Without a trusted cross-border mechanism, foreign-originated calls will continue to enter the United States with limited authentication information, leaving gateway

[5] *FNPRM* at ¶127.

providers and terminating providers to rely on blunt tools that can over-block lawful traffic or under-detect unlawful traffic. CBCA provides a more consistent and calibrated alternative by allowing legitimate international providers to demonstrate trustworthiness while preserving scrutiny for providers and traffic that do not meet the framework's standards.

B. The Commission Should Require Service Providers to Accept Foreign Originated Call Attestations Only from Entities Approved by the STI-GA

Recognizing that there will likely be multiple Governance Authorities for foreign-originated calls (both jurisdictional and non-jurisdictional), the CBCA-GA believes that it is imperative that only those that have comprehensive policies, practices and controls in place be approved for interoperability with the STI-GA. The CBCA-GA appreciates the efforts and foresight of the STI-GA, which has developed a process to evaluate governance authorities, both jurisdictional and non-jurisdictional.[6] The CBCA-GA believes that the equitable application of this process by the STI-GA will ensure that all governance authorities have robust policies in place that include necessary protections from illegal calls.

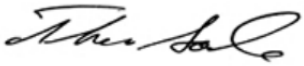
The CBCA-GA has requested interoperability with the STI-GA under these policies to permit attestations for calls that originate internationally to be passed through the call path and verified by the terminating provider in the U.S.

[6] On July 23, 2026, The STI-GA announced that it selected Numeracle to develop a global vetting framework for Cross-Border STIR/SHAKEN Governance to evaluate Non-jurisdictional Governance Authorities seeking interoperability with the STI-GA. *See* https://atis.org/press-releases/sti-ga-selects-numeracle-to-develop-global-vetting-framework-for-cross-border-stir-shaken-governance/.

III. CONCLUSION

The CBCA-GA appreciates the opportunity to provide feedback to the *FNPRM* and urges the Commission to support CBCA and to require service providers to accept foreign originated call attestations only from providers with STI-GA approval.

Respectfully submitted,



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