

**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	)	CG Docket No. 17-59
Unlawful Robocalls	)	

**REPLY COMMENTS OF THE
JOINT IP NETWORK-TO-NETWORK TASK FORCE**

The Joint IP Network-to-Network (IP-NNI) Task Force hereby responds to the comments submitted to the Federal Communications Commission’s (Commission or FCC) May 21, 2026, *Further Notice of Proposed Rulemaking (FNPRM)* in the above-referenced dockets. In these reply comments, the IP-NNI Task Force supports those commenters who urge the Commission not to impose attestation requirements that differ from the industry standard or that could constrain future standards development.

I. REPLY COMMENTS

In its comments to the *FNPRM*, the IP-NNI Task Force urged the Commission to refrain from requiring 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-1000074.¹ Instead, the task force urged the Commission to allow the attestation signal to remain an indicator of customer authentication and calling telephone number authorization status.

¹ IP-NNI Task Force Comments at pp 4-5.

The IP-NNI Task Force is pleased to see support among commenters for this view. CTIA – The Wireless Association (CTIA) recommends that the Commission not impose attestation requirements that depart from ATIS standards or constrain future standards development.² Instead, CTIA urges the Commission to “preserve flexibility for ATIS to quickly update its standards to adapt to bad actors’ changing tactics” and to “leverage the ATIS standards development revision processes to explore what, if any, revisions to the STIR/SHAKEN standard could help to counteract bad actors’ tactics, thereby contributing to the agency’s robocall mitigation goals.”³

NCTA – The Internet and Television Association (NCTA) agrees that the Commission’s current and longstanding approach to the Commission’s caller ID authentication rules – which relies on industry compliance with standards that are developed via an extensive process of collaboration across industry stakeholders – is sound. “The alternative approach suggested in the *FNPRM* – in which the Commission would replace those industry standards with an extremely detailed and inflexible set of rules – would raise the very concerns the Commission recognized long ago. Such an approach risks not only creating inconsistencies with current industry standards but also depriving providers of the flexibility to keep up with future standards as they evolve.”⁴

² CTIA Comments at p. 18.

³ CTIA Comments at p. 20.

⁴ NCTA Comments at p. 4.

II. CONCLUSION

The IP-NNI Task Force urges the Commission not to impose attestation requirements that differ from ATIS-1000074 or that could impede future standards development.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode", written in a cursive style.

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