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
	)	

Reply Comments of the

Secure Telephone Identity Governance Authority

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SUMMARY

The Secure Telephone Identity Governance Authority Board (STI-GA) hereby submits these reply comments in response to the Federal Communications Commission's (Commission or FCC) May 21, 2026, *Further Notice of Proposed Rulemaking* in the above-referenced dockets. In these replies, the STI-GA:

- Supports those commenters that urge the Commission to take a holistic approach to robocalling, recommending that the Commission prioritize enhancements to its Robocall Mitigation Database (RMD);
- Agrees with those who urge the Commission to retain responsibility for investigating and enforcing its rules;
- Notes opposition to the Commission's speculative proposal regarding SPC token holders that are "unlikely to comply" with the STIR/SHAKEN framework;
- Urges the Commission to ensure that its rules acknowledge the appropriate, limited role of STI-CAs; and
- Notes that more reasonable deadlines and a clear safe harbor would be essential if the Commission moves forward with the proposed rules.

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REPLY 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 these replies, the STI-GA: (1) supports those commenters that urge the Commission to take a holistic approach to robocalling and recommends that the Commission prioritize enhancements to the Commission's Robocall Mitigation Database (RMD); (2) agrees with those who urge the Commission to retain responsibility for investigating and enforcing its rules; (3) notes opposition to the Commission's speculative proposal regarding SPC token holders that are "unlikely to comply" with the STIR/SHAKEN framework; (4) urges the Commission to ensure that its rules acknowledge the appropriate, limited role of STI-CAs; and (5) notes that more reasonable deadlines and a clear safe harbor would be essential if the Commission moves forward with the proposed rules.

[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. REPLY COMMENTS

A. The Commission Should Consider Consolidating and Prioritizing Open Robocalling Issues

The STI-GA appreciates the Commission's efforts to address the challenges associated with illegal robocalling and agrees with those commenters that recommend the Commission address these issues holistically and not in a series of overlapping proceedings. As the Voice on the Net Coalition (VON) points out, "[c]urrently, there are at least eight pending robocall-related proceedings, many addressing overlapping definitions and interlocking rules directly impacting this FNPRM. Releasing standalone decisions will only create confusion, implementation complications and delay."[2] T-Mobile USA, Inc. (T-Mobile) similarly notes that "[t]he KYUP and STIR/SHAKEN proposals in this FNPRM, together with the related KYC and Robocall Mitigation Database ("RMD") proceedings, are distinct but mutually reinforcing tools in a broader robocall mitigation framework" and recommends that, "[a]s each of these proceedings affects the same provider relationships, voice traffic flows, and compliance processes, the Commission should align definitions and sequence implementation, and avoid imposing duplicative obligations that do not materially enhance efforts to mitigate illegal robocalls." In its comments, Bandwidth Inc. and Bandwidth.com CLEC, LLC (Bandwidth) also recommend explicitly coordinating the Commission's "know your customer," "know your upstream providers" and RMD proceedings.[3]

The STI-GA agrees. The Commission's segmented approach fails to account for the potential impacts that certain proposed rules could have on other elements of the voice ecosystem under consideration in a different proceeding. Without a consolidated approach, the

[2] VON Comments at pp. 1-2.
[3] Bandwidth Comments at pp. 5-6.

Commission would be creating a patchwork of regulatory requirements. Each rulemaking would propose and prioritize new rules on top of pending proposed rules, creating a patchwork of overlapping, interrelated requirements for the vetting and verification of STIR/SHAKEN service providers. This would be extremely confusing and make it impossible for the Commission and the industry to implement and gauge the effectiveness of any new rules before the regulatory landscape changes again.

A consolidated approach would allow for more careful consideration of the effectiveness of the rule changes. It would allow the Commission and the industry to better identify whether new rules are needed and to avoid duplication and the imposition of unnecessary burdens. It will also allow for more consistent and effective policies and enhance the visibility of these changes and help avoid confusion. A consolidated approach would likely be less costly and burdensome for the industry to implement as service provider systems and processes can be updated once and not as a series of different changes released over time.

In addition to taking a holistic approach to addressing all of the issues raised in the open robocall-related proceedings pending, the Commission should also prioritize its focus to examine first what changes to the RMD can be made to improve this database and ensure that it can be relied on by STI participants. As the STI-GA noted in its comments, no provider may join the STIR/SHAKEN ecosystem until and unless it has a Robocall Mitigation Plan registered in the RMD. For this reason, the STI-GA agrees with commenters who suggest the Commission first take steps to strengthen its RMD, including vetting applications prior to inclusion in the database, before imposing potentially unnecessary and/or duplicative requirements on the STI-GA or other STI participants.[4]

[4] The Commission already acknowledges its responsibility to vet RMD registrants but does retroactively after the registrant has been entered into the database. The STI-GA urges the Commission to take a proactive approach to

As NCTA – The Internet and Television Association (NCTA) explains in its comments, "service providers and industry support groups rely on a provider's presence in the RMD as an indicator of a provider's trustworthiness."[5] USTelecom notes that "a rigorous, actively supervised RMD would be a more effective means of achieving what the *FNPRM* asks KYUP to accomplish."[6] The STI-GA agrees. The lack of vetting prior to providers getting into the RMD directly affects the quality of providers participating in STIR/SHAKEN.

Taking a holistic approach and prioritizing recent robocalling proposals will allow the Commission to appropriately tailor its approach. As multiple parties acknowledge, the Commission's proposals in the *FNPRM* are overbroad.[7] The VON explains that "[t]he record in this proceeding shows that just 45 voice service providers ('VSPs') – 0.4% of the 10,872 VSPs with filings in the Robocall Mitigation Database ('RMD') – are responsible for 90 percent of illegal calls."[8] ZipDX LLC agrees, noting that "[s]tudies reveal that a relatively small number of providers facilitate a disproportionate fraction of robocalls."[9] As T-Mobile says, "the Commission should focus on providers responsible for illegal traffic."[10] Focusing Commission enforcement and investigatory efforts on these providers would be an appropriate next step and more effective at addressing challenges than the Commission's segmented approach.

vetting and looks forward to participating in the RMD proceeding.

[5] NCTA Comments at 2.

[6] USTelecom Comments at 8

[7] T-Mobile Comments at 2.

[8] VON Comments at p. 2; *see also* TransUnion Comments in response to *Commission Call Branding Rulemaking* at p. 9 (noting that "89.4 percent of calls originated by the ten providers considered the most prolific generators of robocalls by TransNexus were signed with A-level attestation"). Presumably, the 45 service providers have been identified by analytics providers, the ITG and the Commission. The STI-GA looks forward to coordinating with the Commission and ITG to provide relevant information that will assist the Commission to take appropriate action against these providers. This supporting role in the Commission's enforcement efforts is appropriate for the STI-GA.

[9] ZipDX Comments at p. 3.

[10] T-Mobile Comments at p. 2.

B. The Commission Should Consider Retaining Enforcement and Investigative Responsibility of Commission Rules

In the *FNPRM*, the Commission proposes that the STI-GA and other STI participants play a role in investigating and enforcing violation of Commission rules.[11] Commenters agree that the Commission cannot and should not delegate its law enforcement and investigation responsibilities to the industry. INCOMPAS/Cloud Communications Alliance (INCOMPAS/CCA) notes that "[t[he Commission's proposals to vastly expand the investigative and enforcement role of industry contemplated by the Notice stretch boundaries of lawful delegation of government functions to private parties." [12] VON agrees that the Commission should not delegate enforcement to the STI-GA or other industry bodies, explaining that "those core governmental functions must remain with the Commission."[13]

The Commission's attempt to delegate enforcement authority also raises competitive concerns, as noted by the STI-GA and other commenters.[14] INCOMPAS/CCA point out that "[t]he thrust of the Commission's proposal appears to further enhance the industry's self-policing role by increasing the incidences in which providers determine whether to preclude competitors from providing service. This creates an inherent competitive tension that the Commission's proposals would further aggravate."[15] USTelecom – The Broadband Association (USTelecom) agrees: "The RMD also reflects the definitive judgment of the Commission, without the complications involved in competitors evaluating each other's compliance."[16]

The enforcement and investigatory role proposed by the *FNPRM* is also incongruous with

[11] *See e.g., FNPRM* at ¶48-49.
[12] INCOMPAS/CCA Comments at p. 3, 14.
[13] VON Comments at p.7.
[14] *See* STI-GA Comments at p.9, INCOMPAS/CCA Comments at p. 16, USTelecom Comments at p. 8.
[15] INCOMPAS/CCA Comments at p. 16.
[16] USTelecom Comments at p. 8.

the nature of the STI-GA, as the STI-GA and others noted in their comments.[17] NCTA explains that "[t]he ITG and the STI-GA are operated and funded by the communications industry…[and] generally operate in a manner that is similar to standards-setting bodies, rather than investigative or enforcement bodies[18]." As was explained in its comments, the STI-GA is a voluntary Board that was developed based upon a framework created by the Commission's North American Numbering Council (NANC) in its Call Authentication Trust Anchor (CATA) Working Group.[19] The framework, which was accepted and approved by the Commission, did not assign to the STI-GA broad investigatory or enforcement responsibilities related to the Commission's robocalling rules. These new responsibilities could require significant changes to the STI-GA, including potential structural changes to the STI-GA Board and its operations. It could also discourage continued or future industry participation by asking volunteer Board members and their sponsoring organizations to assume responsibilities – and associated legal, operational, and reputational risks – that extend well beyond the governance and standards-setting functions for which the STI-GA was established.

Many commenters acknowledge that the nature of STIR/SHAKEN is not to investigate or enforce Commission rules but to identify the calling party. Numeracle notes that "[e]ven perfectly administered, a STIR/SHAKEN attestation verifies a provider's relationship to a telephone number. It tells the call recipient nothing about who is calling."[20] NCTA explains that the Commission's proposals would be a significant reorientation of STIR/SHAKEN attestation, changing the meaning of attestation from a caller-ID authentication signal into a broader

[17] *See* STI-GA Comments at pp. 4-6.
[18] NCTA Comment at p. 2.
[19] 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).
[20] Numeracle Comments at p. 23.

compliance certification. It would suggest that a provider's attestation communicates a more definitive understanding of the customer's identity and business practices, even though STIR/SHAKEN was designed only to authenticate caller ID information and the provider's knowledge of the number relationship."[21]

Instead of attempting to delegate investigatory or enforcement responsibilities to industry, the Commission should collaborate with the STI-GA and the Industry Traceback Group (ITG). The STI-GA was recently invited to a joint meeting with the Commission and ITG to discuss technical issues associated with the signing of calls. During this meeting, the STI-GA provided technical expertise to assist the Commission in its investigation of providers that may not be complying with the Commission's robocalling rules. The STI-GA urges the Commission to continue this collaboration and cooperation with the industry to support the Commission's enforcement of its robocalling rules.

C. The Commission Should Reconsider Requiring the STI-GA to Engage in Speculative "Unlikely to Comply" Evaluations

In its comments, the STI-GA noted its concerns regarding the Commission's proposal that the STI-GA 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] Other commenters share similar concerns. INCOMPAS/CCA notes that *FNPRM*'s proposed "unlikely to comply" rules are vague and would impose an unrealistic and impracticable obligation on the STI-GA to guess at a token applicant's future actions.[23] America's Communications Association (ACA) explains in its comments that "[s]ervice should only be discontinued when a comprehensive, objectively

[21] NCTA Comments at p. 7.
[22] STI-GA Comments at pp. 14-15.
[23] INCOMPAS/CCA Comments at p. 15.

reasonable assessment of the circumstances indicates it is justified, except where immediate action is required to prevent ongoing unlawful traffic."[24] The proposed "unlikely to comply" rules may be too subjective and impractical to adopt as currently framed. The Commission should not forgo appropriate procedural safeguards for the sake of administrative expediency, nor should it delegate that burden to industry participants in its stead.

D. The Commission Should Consider Acknowledging the Appropriate Role of STI-CAs in Its Robocalling Rules

In its comments, the STI-GA noted that the Commission's proposal to assign investigative and enforcement responsibility to authorized STI-CAs is infeasible as STI-CAs are not in a position perform enforcement work.[25] Somos agrees that the STI-CA role is largely mechanical: "The CA does not choose who participates or vouch for how a provider attests, and loading fraud responsibility onto a mechanical user would neither deter bad actors nor reflect other PKI works."[26]

Similarly, the Commission may overstate the potential dangers of an STI-CA being affiliated with a service provider. The STI-GA believes, as it explained in its comments, that there is little risk associated with this scenario.[27] As Somos notes in its comments, "[t]he affiliation by itself does not give a CA the capacity to enable illegal calls, because a CA has no power beyond issuing certificates. That is, the CA does not hold the provider's private keys, it does not sign calls, and it does not make attestation decisions. The decision to sign an illegal call rests entirely with the provider that holds the key and signs, regardless of which CA issued the certificate, including where the CA and the provider are the same entity."[28]

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[24] ACA Comments at p. 5.
[25] STI-GA Comments at p. 25.
[26] Somos comments at p. 34.
[27] STI-GA Comments at pp. 16-17.
[28] Somos Comments at p. 34.

E. Should the Commission Nonetheless Proceeds, Additional Implementation Time and a Clear Safe Harbor Would Be Warranted

The STI-GA recommends that the Commission not move forward with the *FNPRM* but instead consolidate it with the other open rulemakings. Such an approach would permit the Commission and the industry to better develop enhancements to the STI ecosystem that would be effective with unnecessary duplication or burden. Should the Commission nonetheless move forward with the *FNPRM*, the STI-GA urges the Commission to provide additional time for implementation and for STI-GA action and to protect STI participants.

Deadlines. As the STI-GA explained in its comments, the timeframes the Commission has proposed for the implementation of new functionality and for the review of any complaints to the STI-GA are insufficient.[29] For example, if the Commission assigns to the STI-GA new investigatory and enforcement roles, significantly more than six months will be needed for the STI-GA to implement the expansive changes. The changes proposed by the Commission could require a complete overhaul of the STIR/SHAKEN ecosystem.[30]

The proposed ten-day turnaround for complaints is similarly infeasible.[31] Such a requirement would undermine due process as there is no reasonable way for the STI-GA to respond to complaints within 10 days in a manner that would afford STI participants with a fair and reasonable opportunity to have their views equitably considered. As explained in its comments, the STI-GA Board consists of subject matter experts that volunteer their time to support this important work.

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[29] STI-GA Comments at p. 25.

[30] As explained in the STI-GA's comments, structural and procedural changes to the STI-GA would be necessary to implement the proposed rules, including a possible restructuring of the STI-GA Board, the drafting of new and/or amendment of existing policies, the potential issuance of RFP(s) to secure investigative resources and third-party vetters, associated contract negotiations and testing, and vetting of an ecosystem that has more than 2,200 providers and continues to grow.

[31] *FNPRM* at ¶50.

Safe Harbor. If the Commission assigns these new roles to industry, then safe harbors are required. As the STI-GA stated in its initial comments, "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."[32] This view is shared by a number of commenters, who note the need to protect STI participants from liability associated with the proposed new rules. T-Mobile, INCOMPAS/CCA, VON, NCTA, USTelecom and CTIA all support a safe harbor to protect good faith compliance efforts, such as compliance with best practices.[33] The STI-GA continues to urge the Commission to clarify that STI-GA efforts to comply with the Commission's rules are entitled to immunity under federal antitrust laws.

[32] STI-GA Comments at 31.
[33] *See* T-Mobile Comments at pp. 7-8, INCOMPAS/CCA Comments at p. 12, VON Comments at p. 11, NCTA Comments at p.4, USTelecom Comments at p. 7; and CTIA Comments at p. 17.

II. CONCLUSION

For the foregoing reasons, the STI-GA urges the Commission to take a holistic approach to its open robocalling proceedings (including this rulemaking and the Commission's recent robocalling numbering, KYC and RMD rulemakings), prioritize improvements to the Robocall Mitigation Database, and retain responsibility for investigating and enforcing its own rules. The Commission should decline to impose speculative "unlikely to comply" obligations on the STI-GA or other STI participants and should ensure that any rules accurately reflect the limited roles of the STI-GA and STI-CAs within the STIR/SHAKEN ecosystem. If the Commission nevertheless proceeds with the proposals in the *FNPRM*, it should provide sufficient implementation time and adopt clear safe harbor protections for industry participants acting in good faith to comply with Commission requirements.

Respectfully submitted,

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September 8, 2026