

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

In the Matter of	)	
	)	
Improving the Effectiveness of the Robocall Mitigation Database	)	WC Docket No. 24-213
	)	
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**

The Secure Telephone Identity Governance Authority Board (STI-GA) hereby submits these comments in response to the Federal Communications Commission’s (Commission or FCC) July 23, 2026, *Further Notice of Proposed Rulemaking (FNPRM)* in the above-referenced dockets. In these comments, the STI-GA: (1) explains that its policies permit service providers and their affiliates to use a single account and share SPC tokens; (2) agrees that providers should submit accurate information to the Commission and STI-GA; (3) notes that it is willing to share authorized providers’ OCNs with the Commission on a non-public basis; (4) supports direct notice from the Commission of RMD removals; (5) supports increased two-way cooperation among the Commission, STI-GA, and industry stakeholders; and (6) agrees that enforcement is appropriate for material inconsistencies with STI-GA data, but recommends that the Commission provide clear guidance and avoid penalizing providers for immaterial discrepancies.

I. BACKGROUND

The STI-GA was established to define the rules governing the certificate management infrastructure to ensure effective use and security of SHAKEN certificates. The governance structure was proposed by industry and approved by the Commission's North American Numbering Council (NANC) and by the Commission. The STI-GA is governed by a Board, which includes representation from key stakeholders that volunteer their time and expertise to support the STI ecosystem. The twelve-member 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; 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. COMMENTS

A. STI-GA Policies Do Not Require Separate STI-PA Accounts for Each Affiliated Service Provider Entity

In the *FNPRM*, the Commission notes an apparent disparity between RMD filings claiming full or partial STIR/SHAKEN implementation and the Governance Authority's list of authorized providers and asks if it is permissible under Governance Authority policies for providers that file independently in the RMD to share SPC tokens.¹ STI-GA policies do not

¹ *FNPRM* at ¶16.

require separate accounts for each affiliated service provider entity.

The STI-GA does not see a benefit to requiring affiliated providers to register for separate accounts with the STI-PA, regardless of whether they are required to file independently in the RMD and would oppose changing its policy on this matter. The goal of the STI ecosystem is to have calls signed so that they may be tracked back to the originating service provider. As long as the provider can be identified, it does not matter whether that provider is a parent or an affiliate entity. This STI-GA policy is consistent with the other industry policies, such as the North American Numbering Plan Administration System (NAS), which requires each registrant to provide a company name and specifies that the Parent company name is preferred.² In accordance with STI-GA policies, STI Policy Administrator (STI-PA) systems were designed to allow service providers the flexibility to have a single account with multiple OCNs to accommodate the fact that many providers have subsidiaries.

Requiring affiliated providers to create separate accounts with the STI-PA would have significant negative impacts the STI ecosystem and impose significant new costs and burdens, especially for larger providers that may have a number of subsidiaries and/or affiliates. The significant and ongoing burdens associated with such a requirement (registration, billing, account management, etc.) would significantly outweigh any benefits of this more granular data. It would also take more time for providers to register each affiliate/subsidiary separately and to update and maintain these registrations.

Increasing the number of filings from the same company, or requiring separate SPC tokens and/or certificates, would make it more difficult for the industry to perform traceback. Instead of a single entity, traceback would require outreach to each affiliate, many of which do

² NAS Registration User Guide, Version 1.0, Section 2.5, https://www.nanpa.com/sites/default/files/2024-04/Other_NASRegistrationUserGuide.pdf.

not have dedicated personnel to respond to traceback requests and must rely on the parent to respond. Contacting the parent directly would be a more efficient solution in these circumstances.

The STI-GA cautions the Commission against conflating filing in the RMD with receiving an SPC token. There are valid reasons that certain providers may not need to get an SPC token (for example, if the provider is not signing the call). Therefore, while an SPC token is required for a provider to be listed in the RMD, being listed in the RMD does not necessarily mean that a provider is required to get an SPC token.

The STI-GA notes that it has received no complaints or concerns about its current method of service provider account creation or certificate assignment and does not believe that its policy causes confusion for downstream providers.

B. Providers Should Submit Accurate Information to the Commission and the STI-GA

The Commission proposes that providers must certify that they have not submitted false, misleading, or inaccurate information to the Commission, any agent or other third party designated by the Commission or acting on behalf of the Commission pursuant to Commission rules or direction, or the Governance Authority.³ The STI-GA supports this proposal and agrees that providers should submit accurate information to the Commission in their 499 and RMD filings and to the STI-GA during the authorization process. The STI ecosystem depends on the submission of accurate data by STI participants. The STI-GA is aware that some prospective STI participants have attempted to seek authorization by submitting inaccurate information to the STI-PA. It is likely that inaccurate information has also been given other bodies (Commission, National Exchange Carrier Association (NECA), etc.).

³ *FNPRM* at ¶21

The *FNPRM* also proposes that the STI-GA (as well as ITG and NANPA) be considered to be a third party designated by the Commission or acting on behalf of the Commission pursuant to Commission rules or direction, noting that these entities play an important role in the robocall mitigation system.⁴ The STI-GA agrees that it plays a pivotal role in call authentication, helping to authenticate the origin of the call and the caller's right to use the telephone number in the caller ID field, as well as assisting with traceback.⁵ While the STI-GA is an independent body with a role that is separate and distinct from the Commission's and other entities' roles, it recognizes the value of close cooperation and coordination. The STI-GA looks forward to working cooperatively with the Commission and other stakeholders to ensure the continued success of the STI ecosystem.

C. The STI-GA Is Willing to Share OCN Data with the Commission on a Non-Public Basis

The Commission also asks whether the Governance Authority should either provide the Commission with data, including OCNs associated with authorized providers, or direct the Policy Administrator to do so by including the OCNs associated with authorized providers on the Policy Administrator's public list of authorized providers or by sharing such information with the Commission on a non-public basis.⁶ The STI-GA is willing to share authorized providers' OCN data with Commission on a non-public basis consistent with the terms of the STI service provider agreement, as the STI-GA has in the past.

As OCN's are a private resource managed by the National Exchange Carrier Association (NECA), the STI-GA does not have the right to publish a list of OCNs assigned to each provider.

⁴ *FNPRM* at ¶21.

⁵ As explained in its comments to the KYUP *FNPRM*, the STI-GA strongly disagrees that the Commission has authority over the STI-GA or ATIS. The STI-GA appreciates that the *FNPRM* distinguishes between "any agent or other third party designated by the Commission or acting on behalf of the Commission pursuant to Commission rules or direction, or the Governance Authority." (emphasis added) *FNPRM* at ¶21.

⁶ *FNPRM* at ¶77.

Should the Commission desire the list of OCNs, the STI-GA recommends that the Commission work with NECA.

D. The Sharing of RMD Removal Information with the STI-GA Would Be Beneficial

The Commission seeks comment on whether it should notify the Governance Authority of removals from the RMD.⁷ The STI-GA strongly supports this proposal. The STI-GA would welcome direct Commission notices, especially if it would ensure more expedient service provider revocation where warranted. Today, the STI-GA and STI-PA independently review the weekly Commission reports on RMD deletions to determine if any STI-PA authorized providers have been removed from the RMD. A provider is revoked if it is found that it has been completely removed from the RMD but is not revoked if the provider still has an RMD listing or if it refiles. The STI-GA also monitors all Commission RMD removals for authorized providers and directs the STI-PA to revoke authorized providers' SPC tokens and certificates when the Commission orders providers removed from the RMD. Indeed, the STI-GA worked with Commission staff to create a process to coordinate STI-GA and Commission processes for such removals.

E. There Is Great Value in Mutual Cooperation

The Commission seeks comment on the benefits of increased information sharing and coordination between the Commission and the Governance Authority.⁸ The STI-GA recognizes the value in collaboration and in the two-way sharing of information and meets regularly with Commission staff. The STI-GA would welcome additional opportunities to provide updates on developments and to receive information from the Commission.

⁷ *FNPRM* at ¶119.

⁸ *FNPRM* at ¶137.

A recent joint meeting with the Commission and the ITG is a model of effective cooperation. The STI-GA provided information on the technical workings of the STIR/SHAKEN ecosystem and its policies, allowing the Commission to better appreciate various technical challenges with a proposal the Commission may be considering. This approach allows the Commission to better craft new and enforce existing Commission policies, more clearly identify challenges, and refine its proposals to improve the integrity of the voice ecosystem.

The STI-GA welcomes the Commission sharing with the STI-GA about developments impacting the STI ecosystem, including RMD removals, questions or comments regarding STI-GA policies, questions or concerns that may have been raised about the STI-GA or STIR/SHAKEN ecosystem, etc.

The STI-GA proposes that the Commission consider creating an industry advisory council similar to the NANC, but specific to robocalling issues, to allow stakeholders to provide input in a collaborative environment to ensure that proposed rules do not negatively impact the STIR/SHAKEN or the voice ecosystem. The NANC was a valuable resource that allowed the industry to cooperate and better inform stakeholders, including the Commission, on how STIR/SHAKEN could be effectively leveraged in a technically feasible manner. A new advisory council could similarly benefit the Commission by facilitating cooperative input on ways to address challenges associated with illegal robocalls, in general, not just STIR/SHAKEN related issues.

The newly proposed forum should be separate and distinct from the STI-GA and should be focused solely on helping the Commission address robocalling challenges. The Commission should not seek to transform the STI-GA into an advisory council. The STI-GA should continue

to fulfill the service provider-driven role as manager of the STI ecosystem as envisioned by the NANC report.

F. Enforcement Is Warranted for Material Inconsistencies with STI-GA Data, but the Commission Should Provide Additional Guidance

The Commission proposes that material inconsistency with Governance Authority data or the submission of misleading or inaccurate information would be grounds for RMD removal or other enforcement activity.⁹ The STI-GA agrees that enforcement activity would be appropriate for materially deficient RMD filings – those that contain substantially and materially incomplete or insufficient information, material internal inconsistencies, or information that is materially inconsistent with information the provider has reported elsewhere or with reliable external sources, such as the Governance Authority. Should the Commission find a provider’s RMD filing insufficient, it can take action to remove the RMD filing, and the STI-GA will take action to revoke the provider’s SPC token and any certificates assigned it. To the extent that the Commission finds material insufficiencies in service provider registrations before they are included in the RMD, no STI-PA revocation will be necessary.

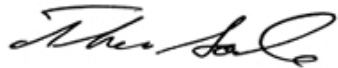
The STI-GA recommends that the Commission provide additional guidance regarding how it will determine whether a filing is “materially inconsistent” with STI-GA data. The STI-GA urges the Commission to avoid overly broad interpretations that would unfairly penalize providers for insignificant inconsistencies.

⁹ *FNPRM* at ¶80.

III. CONCLUSION

For the foregoing reasons, the STI-GA urges the Commission to preserve flexible service-provider account structures while requiring accurate and materially consistent information from RMD filers and STI participants. The STI-GA supports confidential information sharing, timely notice of RMD removals, and continued two-way coordination with the Commission to promote effective enforcement and protect the integrity of the STIR/SHAKEN ecosystem. The Commission should pair any enforcement framework with clear materiality guidance and should consider a separate industry advisory forum that strengthens collaboration without changing STI-GA's service-provider-driven governance role.

Respectfully submitted,



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STI-GA Leadership:

Glenn Clepper, Secure Telephone Identity Governance Authority, Chair; Charter Communications; appointed by NCTA – The Internet & Television Association

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