

Policy Decision 003: SPC token Revocation Policy

Version 2.3

Adoption Date: October 1, 2024

Status: In effect

This policy describes how and why STI Service Provider Code (SPC) tokens may be revoked.

Background. The STIR/SHAKEN framework is an industry-led initiative designed to help mitigate illegal and unwanted caller ID spoofing and robocalling. It is the role of the Secure Telephone Identity Governance Authority (STI-GA) to manage the ongoing operations of the framework. The STI-GA Board, a body composed of a diverse set of telecommunications industry participants, sets the policy for the overall framework.

Within the SHAKEN framework, a service provider (SP) or Responsible Organization (Resp Org) (SPs and Resp Orgs are jointly referred to as STI Participants) will apply to the Secure Telephone Identity Policy Administrator (STI-PA) for a Service Provider Code (SPC) token.

STI-Participant¹. The assignment of the SPC token will allow an STI Participant to apply to an approved Secure Telephone Identity Certification Authority (STI-CA) for the SHAKEN certificate needed for signing SHAKEN PASSporTs and/or any other PASSporT extensions defined for use in the SHAKEN ecosystem. The assignment of the SPC token will also allow an STI Participant to apply to an approved Secure Telephone Identity Certification Authority (STI-CA) for the issuance of an intermediate certificate, which allows the STI Participant to issue delegate certificates to the companies it assigns numbering resources. STI Certificates are used for caller ID authentication. Use of a STI Certificate for purposes of intentionally attesting to false caller ID or other information provides grounds for SPC token revocation. Without a valid SPC token, an STI Participant will be unable to attest to the authenticity of caller ID using the SHAKEN methodology and/or use the STI Certificate for signing other valid PASSporT extensions.

If eligible to receive an SPC token, the STI Participant will be required to execute an agreement explaining the terms under which this token may be used. Misuse of the token or failure to comply with important policies and other safeguards could jeopardize the integrity of the STIR/SHAKEN ecosystem. For this reason, the STI Participant Agreement requires compliance with these policies and safeguards:

¹ For purposes of this policy, an STI Participant is either an authorized Service Provider or Resp Org.

STI Participant shall only use SPC tokens for the intended purposes as set forth in the Participant Agreement and the ATIS SHAKEN Specifications and in compliance with all requirements of such specifications. STI Participant agrees not to sign any telephone calls that do not meet the levels of attestation in the relevant ATIS SHAKEN Specifications.

This agreement also establishes that the STI-PA “may revoke the STI Participant’s access to SPC tokens and/or revoke existing tokens immediately upon indication that STI Participant is in breach of this Agreement.”

Reasons for Revocation. An SPC token may be revoked for the following reasons:

- Compromised credentials: the token’s private key has been lost, stolen, or compromised, or the certificate authority has been compromised.
- The STI-Participant exits the ecosystem and closes its account with the STI-PA.

Only in the cases below would the STI-GA managed revocation process take effect:

- 1) The STI Participant failed to adhere to one or more of the policy and/or technical requirements:²
 - SPC token Access Policy;
 - Funding requirements;³
 - SHAKEN specifications;⁴
- 2) The STI Participant demonstrated persistent inappropriate use of a delegate certificate (grounds to revoke the SPC token of the issuing STI Participant); or
- 3) An SPC token assigned to a non-SP Resp Org is linked to delegate certificates used for non-toll-free telephone numbers; or
- 4) An SPC token assigned to an STI Participant is linked to the signing of a STI-GA recognized⁵ SHAKEN PASSporT extension where the information contained within that extension has been falsified.
- 5) When directed by a court, the FCC, or another body with relevant legal authority due to a violation of Federal law related to caller ID authentication.

Who Has Authority to Revoke tokens? Revocation is to be performed by the STI-PA at its own discretion in some well-defined instances, or as directed by the STI-GA.

² <https://sti-ga.atis.org/wp-content/uploads/2020/04/200211-STIGA-Board-Policy.pdf>.

³ As specified in the STI Participant Agreement (https://sti-ga.atis.org/wp-content/uploads/2020/04/STI-PA_Service_Provider_Agreement.pdf).

⁴ ATIS-1000074, ATIS-1000080, and ATIS-1000084.

⁵ The STI-GA is the governance authority with responsibility to oversee the use of STIR/SHAKEN certificates assigned to STI Participants within the SHAKEN framework. The STI-GA will determine whether STIR/SHAKEN certificates assigned under the SHAKEN Framework should be used for signing standardized extensions.

- STI-PA. The STI-PA is primarily responsible for revoking SPC tokens in the case of compromised credentials, or when an entity is exiting the ecosystem. In either of these instances, there is no question as to whether a SPC token should be revoked. The STI-PA may also revoke SPC tokens as directed by the STI-GA.
- STI-GA. The STI-GA oversees all revocations other than those for compromised credentials or for when an entity is exiting the ecosystem. The STI-GA retains the right to review all STI-PA revocations.

Issue Identification. The first step is the proper identification of an issue that could lead to revocation. Information regarding the need for revocation may come from an STI Participant, the STI-PA, an STI-CA, or even a regulatory agency, but in all cases, it should be delivered to the STI-GA by a standardized reporting process.

- Reports from STI-CA and STI Participants. To ensure that all relevant information is provided and to facilitate the submission of reports, reporting entities should use the STI SPC token Complaint Submission Form (Complaint Form).⁶ To facilitate the identification of potential problems, an online version of this Complaint Form has also been established. This Complaint Form is to be used by entities approved to operate in the SHAKEN ecosystem to report on potential behavior contrary to that defined in the STIR/SHAKEN specifications, or STI-GA policies.
- Reports from the STI-PA. The STI-PA may seek revocation either for non-payment, or after becoming aware of STI Participant behavior contrary to that defined in the STIR/SHAKEN specifications, or STI-GA policies. In either case, the STI-PA should present this information to the STI-GA via the standardized reporting process - the Complaint Form.
- Reports from the STI-GA. Information on issues related to the use of SPC tokens may also come to the attention of one or more members of the STI-GA Board or ATIS staff. This information should be presented to the STI-GA via the Complaint Form filled in by the party wishing to present the complaint.
- Reports from Regulatory Authorities (e.g., FCC/FTC). Regulatory authorities may become aware of STI Participant behavior contrary to that defined in the STIR/SHAKEN specifications, STI-GA policies, or applicable rules or laws. The regulatory body should submit their request for SPC token revocation to the STI-GA in writing but does not necessarily need to use the standardized Form. The regulatory authority may do so through contact with the STI-GA Director, or with the STI-GA Board Chair or Vice-Chair.
- Reports from Consumers/other Third Parties. Complaints from end users or those entities outside the STIR/SHAKEN ecosystem should continue to be filed

⁶ See Attachment A.

with their SP or Resp Org (as appropriate), or the appropriate regulatory authority. A set of Frequently Asked Questions (FAQs) on the STI-GA website explains to whom consumers and others should direct STI-related inquiries.

STI SPC token Complaint Submission Form (see attachment A). At a minimum, the following data should be collected about a complaint:

- Name of complainant including contact information;
- Name of party against which claim is submitted;
- Nature of complaint and supporting information; and
- Acknowledgment that data may be passed to appropriate regulatory authority (FCC/FTC).

Once filled out, the Complaint Form will be submitted via email directly to STI-GA.

Revocation Process. The following is the STI-GA revocation process:

1. Log-in and initial review. The STI-GA will log the complaint, confirm receipt of the complaint to Complainant, and perform a pro forma review of the information provided to determine if the information provided is sufficient to begin a formal review process. The STI-GA will not act on complaints that are anonymous or do not provide adequate information.
2. Incomplete/insufficient complaints. If the information in the complaint has insufficient information, the STI-GA will seek further information from the Complainant.⁷
3. Complete/sufficient complaints. If the complaint is deemed sufficient:
 - (a) the Complainant will be informed;
 - (b) a copy of the complaint will be sent to STI-PA; and
 - (c) notice of the complaint along with all information collected will be sent to the STI-GA Board.
4. STI-PA Review. The STI-PA will review the complaint and provide to the STI-GA within two (2) business days with:
 - (a) any relevant information it has regarding the complaint, including registration information for the Subject of Complaint, current registration status of all companies involved in complaint (valid for how long, number of SPC tokens, CA used) and, if relevant, Subject of Complaint certificate usage from STI-CA; and
 - (b) a proposed recommendation.

⁷ Sufficient information will include, for example, call headers evidencing of illegal caller ID spoofing with improper A-level attestation, information on the volume of calls received, and STI Certificates that show the name of the Originating SP.

5. Notice regarding confidentiality. A notice will be sent to Complainant and to all involved in the investigation process as to the confidentiality of the forthcoming proceedings to:
 - (a) Ensure protection of confidential data supplied to the STI-GA, STI-PA, Technical Committee (TC), and STI-GA Board;
 - (b) Ensure information regarding the STI-GA investigation of the complaint is not shared with anyone that is not involved in the investigation process; and
 - (c) Note that the timeframe from receipt of complaint for which adequate information has been provided is seven (7) business days.
6. Initial STI-GA Board Review. The STI-GA Board will review the complaint and determine whether to:
 - (a) deny the complaint; or
 - (b) agree to further consider the complaint. The Board may seek additional information from the Subject of Complaint and from the STI-GA Technical Committee (TC).
7. Notice to Complainant. The STI-GA Board will notify the Complainant of the Board's decision in Step 6 and, if the decision is to deny the complaint, the reasons for such denial.
8. Notice to Subject of Complaint (see attachment B). If the Board's decision is to agree to further consideration of the complaint, the STI-GA will contact the Subject of Complaint to:
 - a. Provide notification of the complaint being reviewed; and
 - b. Request a substantive written response within 10 days unless an extension of time is requested by the Subject of Complaint and approved by the STI-GA Board.
9. TC Review. The STI-GA Board may seek TC input. If so, the STI-GA will send the complaint and all relevant information to the TC, which will review and provide a recommendation to the STI-GA Board in a timely manner.
10. Additional Input. The STI-GA Board may also seek additional input from the complainant, Subject of Complaint and/or other STI entities involved in the process, such as STI Participants, STI-PA, STI-CA, TC, STI-GA, and/ or other non-STI entities with relevant information, such as regulatory and law enforcement agencies, the ITG, or others.
11. Board Consideration. The Board will consider relevant information, including:
 - a. The information in the complaint;
 - b. Information from any Board discussions with the Complainant;
 - c. The response from the Subject of Complaint to the notice in Step 8;
 - d. Input and recommendations from the STI-PA;
 - e. Input and recommendations from the TC;

- f. Input and recommendations from other STI and non-STI entities identified in Step 10; and
 - g. A proposed recommendation on moving forward with the complaint review, taking into account (a)-(f).
12. **Board Decision.** Once the STI-GA Board has completed its review, it will vote in a timely manner on whether to grant or deny the complaint.⁸ Approval by two-thirds of the STI-GA Board is required to make this decision.
13. **Notice of Decision.** The STI-GA Board decision on revocation will be transmitted to the Subject of Complaint, the Complainant, and STI-PA.
 - a. If the decision is to revoke, the Subject of Complaint will also be informed of its options to either seek an appeal of the decision or to seek reinstatement.
14. **Post-Decision Actions.** If the Board grants the complaint:
 - a. The STI-PA will deactivate the STI Participant account, revoke the SPC token and notify all STI-CAs of the necessity to revoke any STI Certificates assigned to the Subject of Complaint.
 - b. STI-CAs will ensure any STI Certificates assigned to the STI Participant are added to the Certificate Revocation List and will not assign any new certificates to that STI Participant until they can provide a valid SPC token from the STI-PA.
15. **Public Notice.** The STI-GA will post public notice of the SPC token revocation for cause.
16. **Appeals.** Appeals will follow the Formal Appeals process outlined in Section XI of the STI-GA Operating Procedures.⁹
17. **Other considerations:** Following the finalization of the decision, the STI-GA Board will consider whether to:
 - (a) Refer the complaint to the appropriate regulatory agency; and/or
 - (b) Recommend changes or clarification to any STI-GA Policy to address issues raised during the Board's consideration of the complaint.

⁸ The STI-GA disposition of the complaint may result in; revocation; imposition of a "probationary period" in lieu of revocation; or non-revocation. "Probationary period" is described in the STI-GA SPC token Reinstatement Policy.

⁹ The STI-GA oversees the STIR/SHAKEN framework. Part of this oversight includes the potential revocation of a service provider's SPC token. The revocation of an SPC token may render a service provider noncompliant with FCC STIR/SHAKEN rules. As such, the FCC established a process for voice service providers to appeal STI-GA revocation decisions. The FCC requires SPs to exhaust their appeal opportunities with the STI-GA before further appealing to the FCC.
<https://docs.fcc.gov/public/attachments/FCC-21-93A1.docx>

Attachment A**STI SPC token Complaint Submission Form**

Does the company [Subject of Complaint] file a 499A report with the FCC, or is it a Resp Org? If not, please see FAQs related to issue reporting for non-STI participants.

Complainant Information

Company Name:

Individual Responsible for Complaint:

Contact Address:

Contact Email:

Contact Phone:

Information on Subject of Complaint (if known)

Company Name:

Company DBA(s):

Contact Address:

Contact Email:

Contact Phone:

Nature of Complaint: The STI-GA will reject all complaints lacking sufficient supporting rationale. Sufficient supporting rationale should include a detailed description of the issue as well as information to support the claims made. Please note that the STI-GA is primarily concerned with the proper implementation of the STIR/SHAKEN standards and its STI-GA policies. The content of the calls in question will not be a determining factor in any STI-GA decision with regard to SPC token Revocation.

For complaints involving [Improper Attestation](#), please provide the following information:

- 1) Total number of calls involved; and
- 2) Confirmation that the calls were illegally spoofed and signed with an improper level of attestation, or that the calls were originated from a non-U.S. telephone number and signed with a U.S. STIR/SHAKEN certificate; and
- 3) Examples of one or more STI Certificates used to sign the calls; and
- 4) Multiple samples of calls made by filling out the Complaint Data Form.



Secure Telephone Identity Governance Authority

Complaint Data Form

Please check to acknowledge your understanding that all data provided by you may be passed to the appropriate regulatory authority (FCC/FTC) at the discretion of the STI-GA.

Attachment B

STI SPC token Subject of Complaint Data Submission Form

DATE

CONTACT PERSON

ADDRESS

ADDRESS

CITY, STATE, ZIP

STI-GA SPC token Holder (SPC token ID: *XXXX*),

Attached to this letter is a complaint (or multiple complaints) received by the STI-GA regarding a telephone call signed with your STI Certificate. In an effort to resolve that complaint, please provide the following information for each telephone call (and/or each originating telephone number) included in the attached:

1. Confirm or deny that your company (SPC token Holder *XXXX*) was responsible for the origination of the call onto the IP-based service provider voice network as described at ATIS-1000074.v003, §5.24. Please explain any applicable denial.
2. Confirm the level of attestation provided to the call(s).
3. Confirm or deny that your company has a direct authenticated relationship with the customer and can identify the customer.
 - a. Briefly explain the documentation and/or other information you have in your possession that a law enforcement agency may be able to rely upon to identify said customer.
 - b. Please explain any applicable denial. Please keep in mind that if you authenticated the call with either a Full Attestation (A level) or Partial Attestation (B level), you are required to have "...a direct authenticated relationship with the customer and can identify the customer."¹⁰ Per the STI-GA's SPC token Revocation Policy, failure to adhere to proper attestation guidelines is grounds for token revocation.

¹⁰ ATIS-1000074.v003, §5.2.4.

4. Confirm or deny that your customer has the right to use the TN that appears as the calling party (i.e., the Caller ID) and that your company has established a "verified association with the telephone number used for originating the call."¹¹ The following may be used to establish rights the originating caller may have to use the TN(s):¹²
 - a. The TN was assigned to this customer by the signing service provider.
 - b. This TN is one of a range of numbers assigned to an enterprise or wholesale customer.
 - c. The signing service provider has ascertained that the customer is authorized to use a TN (e.g., by business agreement or evidence the customer has access to use the number). This includes TNs assigned by another service provider.
 - d. The TN is not permanently assigned to an individual customer, but the signing provider can track the use of the TN by a customer for certain calls or during a certain timeframe.

Your responses should be certified by a verifiable officer of the company and should be returned no later than XXX, XXX to bstruthers@atis.org.

Thank you.

¹¹ *Ibid.*

¹² *Id.*, Note 1.

Attachment C

STI SPC token Complaint Submission Form Frequently Asked Questions

- 1) I am a service provider that does not qualify for SPC token access, but I have a complaint about STIR/SHAKEN Caller ID Authentication. May I use this complaint form?
 - a. No, this Complaint Form is for use by service providers that qualify for SPC token access and have chosen to take part in the STIR/SHAKEN framework by registering with the STI-PA. As a service provider that does not qualify for SPC token access, you should reach out to your underlying carrier with any issues or questions. If you have a complaint, it can be filed with the appropriate regulatory authority, the Federal Communications Commission or Federal Trade Commission.
- 2) I am a business or residential consumer and I have a complaint about STIR/SHAKEN Caller ID Authentication. May I use this complaint form?
 - a. No, this Complaint Form is for use by service providers that qualify for SPC token access and have chosen to take part in the STIR/SHAKEN framework by registering with the STI-PA. As a business or residential consumer, you should reach out to your telephone service provider with any issues or questions. If you have a complaint, it can be filed with the appropriate regulatory authority, the Federal Communications Commission or Federal Trade Commission, or your state's Attorney General.