

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

In the Matter of	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	
Exemption From Caller ID	)	WC Docket No. 20-68
Authentication Requirements	)	



**COMMENTS**

**I. INTRODUCTION AND SUMMARY**

ACA Connects – America’s Communications Association (“ACA Connects”) hereby submits comments in response to the Public Notice issued by the Federal Communications Commission (“Commission”) Wireline Competition Bureau (“Bureau”) in the above-captioned proceeding. Pursuant to the TRACED Act,<sup>1</sup> the Public Notice initiates a formal review of the two-year STIR/SHAKEN implementation deadline extension the Commission granted small voice providers in last year’s Second Report and Order.<sup>2</sup>

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<sup>1</sup> See Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274, 3277, § 4(b)(5)(F) (2019).

<sup>2</sup> See *Wireline Competition Bureau Seeks Comment on Two TRACED Act Obligations Regarding Caller ID Authentication*, Public Notice, WC Docket No. 17-97, DA 21-1103 at 2-3 (2021) (“Public Notice”); see also *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, FCC 20-136 at ¶¶ 40-43 (2020) (“Second Report and Order”). The Public Notice also seeks comment on deadline extensions granted (1) to voice service providers unable to obtain the “token” necessary to participate in

The Public Notice comes on the heels of the Third Further Notice,<sup>3</sup> where the Commission has proposed curtailing this deadline by one year for those small voice providers “that originate an especially large number of calls.”<sup>4</sup> The record developed in response to the Third Further Notice makes clear that the Commission’s reasons for granting the two-year extension are still valid—and the full extension should be preserved—at least when it comes to facilities-based small voice providers.<sup>5</sup> These providers continue to rely on the full two-year extension to manage the costs and operational burdens of implementing STIR/SHAKEN and to coordinate these efforts with broadband deployment and other costly expenditures. The Commission should therefore conclude that there is no basis to reconsider the two-year extension as to facilities-based small voice providers.

## **II. THE COMMISSION SHOULD PRESERVE THE FULL TWO-YEAR STIR/SHAKEN IMPLEMENTATION DEADLINE EXTENSION FOR FACILITIES-BASED SMALL VOICE PROVIDERS**

In the Second Report and Order, the Commission granted small voice providers a two-year STIR/SHAKEN implementation deadline extension, i.e., until June 30, 2023,

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STIR/SHAKEN, and (2) with respect to services scheduled for section 214 discontinuance. See Public Notice at 1.

<sup>3</sup> See *Call Authentication Trust Anchor*, WC Docket No 17-97, Third Further Notice of Proposed Rulemaking, FCC 21-62 (2021).

<sup>4</sup> See Public Notice at 3.

<sup>5</sup> Commenters on the Third Further Notice widely support an approach in which curtailment of the two-year deadline is targeted at non-facilities-based providers. See ACA Connects Comments on Third Further Notice at 9-10; NCTA Comments on Third Further Notice at 8-10; USTelecom Reply Comments on Third Further Notice at 3-4; NCTA Reply Comments on Third Further Notice at 3-4; Competitive Carriers Association Reply Comments on Third Further Notice at 4-5. In recent filings, ACA Connects has identified steps the Commission can take to “operationalize” this approach. See ACA Connects *Ex Parte* Letter, WC Docket No. 17-97 (Oct. 18, 2021); ACA Connects *Ex Parte* Letter, WC Docket No. 17-97 (Oct. 11, 2021).

in light of the “substantial cost” and operational challenges such providers would incur in implementing this new technology. The Public Notice seeks comment whether these “burdens and barriers” remain.<sup>6</sup> Comments filed in response to the Third Further Notice demonstrate that, for facilities-based small providers in particular, the answer is yes. As ACA Connects and others have explained, the costs and burdens to implement STIR/SHAKEN continue to be substantial relative to budget and resources of a typical facilities-based small provider.<sup>7</sup> The full two-year extension remains appropriate to help such providers absorb these costs.

To be clear, ACA Connects’ small provider members are eager to bring their customers the benefits of STIR/SHAKEN, and we expect that many will have completed implementation well before the deadline arrives. In no event are ACA Connects members inclined to wait until the last minute to get the process underway. On the contrary, as ACA Connects explained in comments on the Third Further Notice, their need to retain the existing deadline is based, in part, on the fact that they operate on tight budgets that require planning of major expenditures far in advance.<sup>8</sup> A sudden curtailment of the STIR/SHAKEN deadline would disrupt current plans that were developed on the basis of the June 30, 2023 deadline, which could increase overall implementation costs as providers rush to find solutions they can implement on a compressed timeline. Scrambling to meet an earlier deadline could also divert

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<sup>6</sup> See Public Notice at 2.

<sup>7</sup> See ACA Connects Comments on Third Further Notice at 4-5; Comments of NTCA on Third Further Notice at 7-8; Comments of WTA on Third Further Notice at 1-2.

<sup>8</sup> See ACA Connects Comments on Third Further Notice at 5.

resources from broadband deployment and network facility upgrades that have been planned for the coming year. In addition, disruptions to communications network supply chains that may not have been fully anticipated when the Commission granted the two-year extension could further exacerbate the challenges of meeting an earlier deadline.<sup>9</sup>

Finally, the ensuing year has borne out the Commission’s prediction in the Second Report and Order that, as a general matter, a two-year extension for small voice providers “would not unduly undermine the effectiveness of STIR/SHAKEN”.<sup>10</sup> Data indicates that the lion’s share of voice traffic originates from large providers that have already successfully implemented STIR/SHAKEN in their IP networks,<sup>11</sup> and in the Third Further Notice, the Commission has proposed hastening STIR/SHAKEN implementation for the subset of small providers that are responsible for a disproportionate volume of illegal calls.<sup>12</sup> The voice providers that remain – facilities-based small voice providers – have relatively few customers (by definition) and modest call volumes, and they are not a proven vector of unlawful traffic. Continuing to allow these providers the extra time they need to overcome the “burdens and barriers” of STIR/SHAKEN implementation will not have an appreciable impact on the overall success of the framework.

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<sup>9</sup> See, e.g., NTCA Comments on Third Further Notice at 7, n.17.

<sup>10</sup> See Second Report and Order, ¶ 44.

<sup>11</sup> See, e.g., Transaction Network Services, “TNS Robocall Report: Nearly 95% of High Risk Calls in 2020 Originated from Non-Tier 1 Carriers,” Mar. 2, 2021, <https://tnsi.com/tns-robocall-report-nearly-95-of-high-risk-calls-in-2020-originated-from-non-tier-1-carriers/> (“Total calls (wanted and unwanted) by the Tier-1 carriers account for 67% of the total volume...”).

<sup>12</sup> In the Robocall Mitigation Database, several hundred voice providers—which no doubt include a substantial number of small voice providers—attest that they have fully or partially implemented STIR/SHAKEN.

### III. CONCLUSION

For the foregoing reasons, ACA Connects urges the Commission to preserve the existing June 30, 2023 STIR/SHAKEN implementation deadline for facilities-based small voice providers. We appreciate the opportunity to participate in this proceeding and encourage the Commission to take our comments into consideration.

Respectfully submitted,



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