

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

**COMMENTS
OF
WTA - ADVOCATES FOR RURAL BROADBAND**

WTA – Advocates for Rural Broadband (“WTA”) hereby supports the continuation, or in the alternative the further extension, of the existing extended deadline until June 30, 2023, of the requirement for small voice service providers with 100,000 or fewer voice service lines to implement STIR/SHAKEN.

WTA is a national trade association that represents more than 360 small rural telecommunications carriers that provide voice and broadband services in a variety of farming, ranching, mining, forest, mountain and desert areas that are generally characterized by low population densities and high construction and operating costs per customer. Virtually all WTA members have fewer than 100,000 voice service lines. And virtually all WTA members are locally owned and/or managed carriers that are very familiar with the customer neighbors with whom their managers and employees intermix regularly at a variety of business, shopping, school, church and social functions and activities.

WTA members are facilities-based carriers that do not encourage or knowingly allow illegal robocalls to be originated over their networks. They stand ready to participate in and to respond expeditiously to industry traceback efforts. They monitor their networks and know their customers, such that it is generally impossible for an entity to obtain enough voice lines and

originate enough calls to establish an illegal robocall operation without being discovered and halted expeditiously by the WTA member.

Whereas there does not appear to be a significant problem with illegal robocalls being originated on the facilities-based networks of WTA members and other rural local exchange carriers (“RLECs”), the costs of implementing STIR/SHAKEN remain substantial at a time when RLEC financial resources are stretched thin by the need to extend and upgrade their broadband networks and to respond to other problems and disruptions resulting from the COVID-19 pandemic. In an earlier phase of this proceeding, WTA noted that its members were reporting first-year STIR/SHAKEN implementation costs averaging between \$50,000 and \$100,000, plus recurring subsequent annual licensing fees of \$40,000 or so. These costs do not appear to have decreased significantly since they were reported in 2020. And whereas these costs may not appear material to large carriers, they are substantial and ill-timed for WTA members and other RLECs that are subject to increased construction and capital costs not only to meet Commission and state broadband build-out obligations but also to respond to the customer demands for service extensions and broadband speed upgrades needed for work at home and distance learning applications during the COVID-19 pandemic. In addition to these substantial investment costs, the COVID-19 pandemic has also resulted in shortages and disruptions that have increased labor and material costs.

Finally, while WTA members are installing more and more Internet Protocol (“IP”) technology on their networks, many still have to route their long-distance voice traffic through older Time Division Multiplexing (“TDM”) tandem switches owned and operated by unrelated larger carriers. Given that STIR/SHAKEN appears to require an all-IP call path, it makes little or no sense for such WTA members to go to the expense of installing STIR/SHAKEN on their

networks because it will be rendered ineffective when their voice traffic passes through the TDM tandem switches operated by the unrelated larger carriers. WTA understands that many of the larger carriers that transport the traffic of WTA members to the public switched telecommunications network do not intend to replace their non-IP tandem switches within the foreseeable future.

The foregoing circumstances and experiences of WTA members show that the burdens and barriers affecting many small voice service providers – particularly WTA members and other RLECs – have not decreased since adoption of the *Second Caller ID Authentication Report and Order*.¹ Rather, small providers continue to be forced to rely upon expensive third-party vendor solutions at a time when their budgets are stretched and limited by the need to extend and upgrade their broadband facilities and services and by the circumstances and disruptions of the COVID-19 pandemic. Continuation of the current small voice service provider exemption until June 30, 2023, for at least WTA members and other RLECs will not adversely impact the public interest because the networks of these carriers do not originate significant numbers of illegal robocalls and can readily locate and terminate any isolated instances that may arise.

The Commission's *Third Further Notice*² does not require a reevaluation of the small voice service provider extension. On the contrary, it supports continuation of the extension for the large portion of law-abiding small voice service providers that are facilities-based by giving the Commission a means to shorten or terminate the extension for the small minority of entities that abuse it. Any small voice service provider (whether facilities-based or non-facilities-based) that encourages or negligently permits an illegal robocaller to originate calls from its network, and/or

¹ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859 (2020).

² *Call Authentication Trust Anchor*, WC Docket No. 17-97, Third Further Notice of Proposed Rulemaking, FCC 21-62 (May 21, 2021).

refuses to cooperate with industry traceback efforts and to implement and enforce an effective robocall mitigation program, should have its extension terminated as of June 30, 2022 or such earlier date as the Commission determines.

Finally, WTA believes that the underlying burdens and barriers to STIR/SHAKEN implementation by small voice service providers resulting from vendor costs, budgetary limitations, broadband deployment priorities and COVID-19 pandemic disruptions are not likely to ease significantly during the next year. Therefore, the Commission can reasonably determine that the public interest would be served not only by continuing the present extension until June 30, 2023, but also by increasing the extension by at least another year.

Respectfully submitted,
WTA – ADVOCATES FOR RURAL BROADBAND

s/ Derrick B. Owens

Derrick B. Owens
Senior Vice President of Government
And Industry Affairs
400 Seventh Street NW, Suite 406
Washington, DC 20004
Telephone: (202) 548-0202
Email: derrick@w-t-a.org

/s/ Gerard J. Duffy

Gerard J. Duffy
Regulatory Counsel
Blooston, Mordkofsky, Dickens, Duffy &
Prendergast, LLP
2120 L Street NW, Suite 300
Washington, DC 20037
Telephone: (202) 828-5528
Email: gjd@bloostonlaw.com

Date: November 12, 2021