

and the resulting undermining of the reasonably comparable service goals of Section 254(b) of the Communications Act.

WTA – Advocates for Rural Broadband

WTA is a national trade association that represents more than 360 rural local telecommunications carriers (“RLECs”) that provide voice, broadband and other services to some of the most rural, remote, rugged, sparsely populated, and expensive-to-serve areas of the United States. WTA members are small companies (often cooperatives or family-owned entities) that have long been constructing, upgrading, and operating rural voice and broadband networks – frequently as providers of last resort – in high-cost farming, ranching, mining, mountain, forest, and desert areas, as well as on Native American reservations and other Tribal Lands. With the exception of one member and its affiliates, WTA members serve 100,000 or fewer voice service subscriber lines and hence qualify for the Section 64.6304(a)(1) small service provider extension for STIR/SHAKEN implementation until June 30, 2023. In fact, the typical WTA member serves fewer than 5,000 customers per service area.

Most WTA members offer Consumer Broadband Only Loop (“CBOL”) services that are purchased by increasing numbers of their rural customers. Some CBOL customers cancel their wireline voice services and instead take wireless originating and terminating voice services from various affiliated or non-affiliated mobile carriers. Other CBOL customers take wireline originating and terminating Voice over Internet Protocol (“VoIP”) services from RLECs and their affiliates, or from non-affiliated VoIP service providers.

WTA members also offer both separate and packaged voice and broadband services to their rural customers. For some members, the voice service is time division multiplexed (“TDM”) service, while other members have converted some or all of their exchanges to VoIP technology.

This situation is further complicated by the facts that RLEC customers purchase resold intrastate and interstate toll services from RLECs and their affiliates or facilities-based or resold intrastate and interstate toll services from non-affiliated voice service providers and that such long-distance voice services can use TDM or IP technology.

Many WTA members and other RLECs that have converted their voice services from TDM to IP cannot implement STIR/SHAKEN effectively because they must hand off their originating voice calls to an intermediate service provider that uses a TDM access tandem that does not pass on the STIR/SHAKEN header. Moreover, even where an RLEC originates an IP call containing appropriate STIR/SHAKEN information and hands the call off to an IP intermediate service provider, the RLEC has no way of knowing whether the call will traverse a TDM tandem switch at some point along the call path and lose the STIR/SHAKEN data. It is WTA's understanding that most or all calls that lack a direct route to a terminating carrier are directed via default to the Local Exchange Routing Guide ("LERG") and are then routed and delivered via one or more TDM tandems.

As the Commission is aware, few (if any) illegally spoofed robocalls have originated on the networks of WTA members and other RLECs. Whereas anything is theoretically possible, RLECs have an excellent record of good citizenship and regulatory compliance, are very familiar with their relatively small local customer bases, and are readily and rapidly able to discover and investigate situations where an existing or new customer may begin to make hundreds or thousands of calls that may be robocalls.

A far more probable and more serious RLEC problem is that, until RLECs can originate IP calls and can be certain that the STIR/SHAKEN information for such calls reaches the terminating service provider, it is likely that calls lacking STIR/SHAKEN authentication will be blocked or

designated as “spam risk” by terminating service providers. This situation is very likely to result in the recurrence of rural call completion problems like those addressed by the Commission in WC Docket No. 13-39 during the 2013-2019 period. By limiting the ability of *bona fide* rural customers of RLECs and other small service providers to complete lawful personal and business calls to destinations served by other carriers, any further delays and gaps in STIR/SHAKEN implementation will deny them the reasonably comparable voice service promised in Section 254(b) of the Communications Act and associated Universal Service Fund programs.

STIR/SHAKEN Should Be Fully Implemented Without Further Delay

The Commission has appropriately made combatting illegal robocalls one of its top consumer protection priorities. It is not uncommon for people working from home to be interrupted 10-to-15 times a day by calls that appear to be coming from neighbors residing in the same local exchange but that are in fact robocalls using illegally spoofed caller ID information. Such calls not only constitute annoyances and disrupt ongoing activities, but can also entail fraud and other unlawful activities.

It is now more than three years since the passage of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (“TRACED Act”). There is no defensible reason to further delay implementation of a ubiquitous STIR/SHAKEN caller ID authentication framework that can put an end to illegally spoofed robocalls.

WTA believes that the most efficient and effective way to accomplish this goal is to upgrade the entire voice network to IP to allow for the initiation, maintenance, and termination of Session Initiation Protocol (“SIP”) calls and to fully implement the STIR/SHAKEN framework throughout such entire network. WTA recognizes that this would entail some investment and expense for its members, as well as for other originating, intermediate and terminating voice

service providers. However, many voice and broadband service providers have already implemented IP in substantial portions of their networks. And without getting into the comparative advantages and disadvantages of various technologies, the indisputable fact is that the telecommunications industry has already moved far down the path toward what is virtually certain to be a future all-IP national network.

If an all-IP network is not possible at this time, WTA believes that the Out-of-Band standard that was published by ATIS in August 2021 is a feasible and effective alternative. This standard was distributed over 15 months ago, and has not been revised or otherwise changed since that time. In fact, it is WTA's information and belief that there is no open or ongoing ATIS proceeding regarding further refinement or revision of the Out-of-Band standard and that the standard is now fully developed and finalized.¹ Moreover, the underlying equipment and software necessary to implement the standard is reasonably available on the commercial market. It is WTA's information that at least one entity (TransNexus) has been using the Out-of-Band standard and equipment to provide STIR/SHAKEN call authentication for multiple service provider customers, and that coordination among multiple Secure Telephone Identity Call Placement Service ("STI-CPS") locations has not caused delays or other problems. One WTA member that has used Out-of-Band STIR/SHAKEN for more than a year reports that it has proven to be highly reliable and effective, and that it enables calls to be completed regardless of the presence of TDM facilities in the call path. WTA believes that Out-of-Band STIR/SHAKEN equipment and services will become more prevalent and less expensive due to network effects if and when the standard is mandated and is adopted and used by hundreds or thousands of small service providers that are unable to avoid call paths that contain TDM tandem switches.

¹Like STIR/SHAKEN itself, it is common for virtually all technical standards and systems to be revised and supplemented as problems are encountered during implementation and operation.

WTA also supports the Non-IP In-Band standard that was adopted by ATIS in August 2021 and revised in August 2022. WTA believes that there is no open or ongoing ATIS proceeding regarding further refinement or revision of the In-Band standard, and that the revised version is now fully developed and finalized. WTA is aware that this standard can be burdensome from both time and expense perspectives because it requires service providers to enter into multiple bilateral agreements to furnish appropriate trust information to other service providers with which they exchange traffic. However, because this standard may be feasible and economical for some carriers under some circumstances, WTA believes that it can and should be approved and employed as a complement to the Out-of-Band standard.

Finally, WTA is aware that some entities are advocating an eleventh-hour proposal for a “VoIP Over the Public Internet” approach. WTA does not understand why this alternative is being introduced three years after the TRACED Act was enacted as a “technical report” rather than going through the normal ATIS standard development process, and at a time when the Out-of-Band and Non-IP In-Band standards are complete and ready for Commission action. Particularly because of the rural call completion dangers arising from incomplete STIR/SHAKEN implementation, WTA opposes further delays and delaying tactics that can result in call completion problems and degradation of the service of the rural customers of RLECs and other small service providers. In addition, WTA understands that the “VoIP Over the Public Internet” approach may suffer from a very limited ability to make technical adjustments and alterations. Without getting bogged down in a detailed back-and-forth over the technical characteristics of “VoIP Over the Public Internet” approach, WTA notes that it has been available for some time and asks why many of the entities advocating the alternative do not themselves appear to have adopted it.

Conclusion

WTA supports the termination of the continuing extension in Sections 64.6303(a) and 64.6304(d) of the Rules for STIR/SHAKEN compliance by non-IP networks because the Out-of-Band and the Non-IP In-Band standards have been fully developed and finalized and the underlying equipment and software necessary to implement them is reasonably available on the commercial market. This step will not only result in closure of the remaining gap in the Commission's caller ID authentication system but also will advance the ongoing transition to the ultimate future IP network. Increased implementation of STIR/SHAKEN – either via the ATIS non-IP standards or via the alternative upgrade of originating, intermediate and terminating networks to IP technology – will head off the danger of increasing call completion problems that will adversely affect the rural customers of RLECs and other small service providers.

Respectfully submitted,
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