

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Call Authentication Trust Anchor)
) WC Docket No. 17-97
)

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission’s Rules,¹ Cloud Communications Alliance, NCTA – The Internet & Television Association, NTCA – The Rural Broadband Association, USTelecom – The Broadband Association, the Voice on the Net Coalition, and WTA – Advocates for Rural Broadband (collectively the “Associations”), hereby seek a 12-day extension of the deadline for filing reply comments in this proceeding,² from January 11, 2023, until January 23, 2023.

The Associations represent a wide range of stakeholders who are continuing to evaluate the robust record in response to the *Notice*. While extensions of time are not routinely granted, the complexity of issues raised and the upcoming holiday period justify a brief extension here. First, the initial comments filed on December 12, 2022 address complex technical, policy, and legal issues raised by the Commission’s *Notice*. The comments were fulsome in responding to the *Notice*’s questions related to the critical issue of how best to approach the existence of non-Internet Protocol traffic in the continued fight against robocalls. Twenty parties, including voice service providers (large and small), trade associations, vendors, and callers filed comments in

¹ 47 CFR § 1.46.

² *Call Authentication Trust Anchor*, WC Docket No. 17-97, Notice of Inquiry, FCC 22-81 (rel. Oct. 28, 2022) (“*Notice*”).

this proceeding. Many of these comments contain detailed information about network design and technical feedback on the feasibility and viability of various solutions to address caller ID authentication for non-IP traffic.

Second, the reply comment deadline falls just after the holiday season and many of the stakeholders participating in this proceeding have key staff that are out of the office for a week or more during the reply period. Moreover, many of the companies that are affected by this proceeding are smaller companies that have limited resources for being able to fully evaluate the record and provide feedback over the holiday when their companies are closed.

The Commission has previously granted extensions of time to file reply comments in similar cases.³ The proposed short extension of time will not prejudice any other party or meaningfully delay the Commission's ability to move forward in this proceeding. Rather, providing all stakeholders' subject matter experts with additional time will allow for a complete review of initial comments and the development of more robust and thoughtful replies. In short, the requested extension will ensure the Commission has the best record available when it evaluates the different alternatives for addressing the existence of non-IP traffic in a STIR/SHAKEN world.

For these reasons, the Associations ask that the Commission extend the reply comment deadline until January 23, 2023.

³ See, e.g., *Resilient Networks, et al.*, Order Granting Extension of Time, DA 21-1483 (PSHSB rel. Nov. 30, 2021) (granting a brief extension to “allow commenters sufficient time to file meaningful comment and reply comments given the intervening holidays”); *Extension Granted for Comment Deadline on Globalstar, Inc. Petition*, Public Notice, 27 FCC Rcd 15787 (2012) (granting an extension to provide parties with additional time to evaluate the record in light of the holiday season); *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, et al.*, Order, 26 FCC Rcd 16941 (2011) (same).

Respectfully submitted,

/s/

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