

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

In the Matter of)	
)	
Call Authentication Trust Anchor)	CG Docket No. 17-97
)	

Reply Comments of WTA – Advocates for Rural Broadband

WTA – Advocates for Rural Broadband (“WTA”) is submitting brief reply comments in response to some of the initial comments in this rulemaking proceeding addressing non-Internet Protocol (IP) networks for the STIR/SHAKEN caller ID authentication framework to combat illegal robocalls.¹ WTA is a national trade association representing approximately 400 small, rural local telecommunications carriers. The typical WTA member company serves fewer than 5,000 customers per service area and has fewer than 50 employees. WTA’s members provide voice, broadband and other communications-related services to some of the most remote, rugged, sparsely populated, and expensive-to-serve areas of the United States. And WTA’s members’ customers have a strong interest in both avoiding illegal and annoying robocalls, but also in ensuring that their legitimate calls are not wrongfully blocked. WTA’s members thus support the development and implementation of effective non-IP caller ID authentication frameworks to supplement the STIR/SHAKEN framework.

WTA agrees with the Commission’s observation in the *NPRM* that “a complete IP transition remains the best solution to achieving ubiquitous caller ID authentication, as it will

¹ *Call Authentication Trust Anchor*, FCC 25-25 (rel. April 29, 2025), published in the Federal Register June 16, 2025 (90 Fed Reg 25186) (hereafter cited as “*NPRM*”).

enable providers to implement STIR/SHAKEN without additional regulatory requirements.”²

Indeed, many of WTA’s members have made that upgrade to IP voice networks. However, as the Court of Appeals admonished the Commission many years ago: “The best must not become the enemy of the good, as it does when the FCC delays making any determination while pursuing the perfect tariff.”³ Moreover, the TRACED Act provides companies with an option to implement a non-IP solution.⁴ WTA thus agrees with NTCA:

As discussed above, the TRACED Act presents a simple binary choice when it comes to mandatory call authentication: transition to IP capabilities for use of STIR/SHAKEN or implement non-IP standards for providers with such facilities still in place. The Commission can and should consider what steps it could take to help and incent providers to elect the first option – transitioning to greater use of IP-enabled networks and interconnection arrangements – so that providers need not implement potentially costly upgrades to non-IP networks for purposes of call authentication compliance.⁵

On the other hand, CTIA suggests that the Commission should not adopt the *NPRM*’s proposal to require providers to either transition to IP or adopt the non-IP solutions adopted by ATIS, but instead should focus on and facilitate the IP transition and enforcement against bad actors.⁶ However, given the TRACED Act’s explicit recognition of the use of non-IP solutions,

² *NPRM* at ¶ 4.

³ *MCI Telecommunications Corporation v. FCC*, 27 F.2d 322, 341-42 (D.C. Cir. 1980).

⁴ *See, e.g., NPRM* at ¶¶ 9-10. *Cf.,* NTCA Comments at p. 4 (the language in the TRACED Act “is more reasonably read to require non-IP providers to begin working on a non-IP authentication solution in response to the TRACED Act’s passage and implement it once one was available to the extent they will not or cannot transition to IP”).

⁵ NTCA Comments at pp. 10-11.

⁶ CTIA Comments at pp. 4-5:

Accordingly, the FCC should reconsider the Hobson’s Choice presented by the *NPRM*’s proposal, which would impede rather than advance the Commission’s goals to protect consumers. Instead, the Commission should focus on prioritizing resources for enforcement against bad actors and promoting the IP transition by evaluating current progress and incentivizing further action.

the Commission cannot simply mandate that all carriers transition to IP networks. WTA agrees with CTIA that the Commission can and should continue to go after bad actors, and that the Commission can and should create incentives for IP transitions.⁷ Such actions, however, are not mutually exclusive with also implementing the statutory element of non-IP solutions.

As the Commission noted in the *NPRM*:

Section 4(b)(5)(B) of the TRACED Act requires that the Commission “grant a delay of required compliance . . . until a call authentication protocol has been developed for calls delivered over non-[IP] networks and is reasonably available.” . . . In 2020, pursuant to the TRACED Act’s directive that voice service providers take reasonable measures to implement call authentication in their non-IP networks, the Commission adopted rules that require voice service providers to either upgrade their networks to IP and fully implement STIR/SHAKEN or provide proof of participation in industry efforts to develop a non-IP caller ID authentication solution.⁸

WTA and many others participated in those “industry efforts to develop a non-IP” solution, and the Commission in this proceeding is now assessing whether those activities have borne sufficient fruit.

In determining whether the conditions in the TRACED Act requirements for the phasing out of the exemption for service providers that do not have all-IP networks have been met, the

See also, CTIA Comments at p. 7:

In the Commission’s words, “progress on the IP transition is paramount.” While the *NPRM* may intend to protect consumers from illegal robocalling campaigns through non-IP call authentication solutions, the best solution remains a complete IP transition. The *NPRM* will have the opposite effect, inconsistent with the Commission’s goals.

⁷ WTA notes that with respect to the transition to IP networks, despite their desire to implement new technology, our members are often hampered by large regional or national carriers insisting on interconnecting/peering on an analog basis. In addition, some of our members’ customers -- including federal government customers -- want to maintain their legacy T1 lines, thus slowing down or complicating the transitions to all-IP networks.

⁸ *NPRM* at ¶¶ 9-10.

Commission indicated that a non-IP solution must be: (1) “fully developed and finalized by industry standards,” and (2) reasonably available such that “the underlying equipment and software necessary to implement such protocol is available on the commercial market.”⁹ WTA agrees with the determination of the Commission that these two requirements have been met:

In this section, we propose to conclude that frameworks using two of the three ATIS-adopted non-IP caller ID authentication standards satisfy the TRACED Act’s requirement using the Commission’s proposed criteria for evaluating non-IP frameworks. Specifically, we propose to conclude that In-Band Authentication (ATIS-1000095.v002) and Out-of-Band Multiple STI-CPS Authentication (ATIS-1000096) are both developed and reasonably available, and therefore satisfy the requirements for repealing the non-IP caller ID authentication continuing extension. We also propose to conclude that these two standards are effective, and therefore satisfy the requirement for providers to take reasonable measures to implement effective non-IP caller ID authentication.¹⁰

The Initial Comments of NTCA and TransNexus likewise agree with the Commission that these two criterion have been satisfied.¹¹

Not all of the commenters supported the Commission’s proposal to find that non-IP frameworks were fully developed and reasonably available in the marketplace. USTelecom and CTIA raised concerns about potential security vulnerabilities.¹² But as WTA explained in its Reply Comments at an earlier stage in this proceeding:

Contrary to Verizon’s speculations, the Out-of-Band system does not make it likely for bad actors to be able to hijack legitimate STIR/SHAKEN credentials and present fraudulent calls to consumers as legitimate calls. First, any entity accessing the STI-CPS network to seek, identify or duplicate a passport must be a service provider and an authorized member of the STIR/SHAKEN system and have a valid STI certificate. Second, the STI-CPS network requires a requesting service provider to provide both the calling number and the called number in order to obtain a passport – a very difficult task for an entity that is not the service provider originating, transporting or terminating the

⁹ *NPRM* at ¶¶ 25-26.

¹⁰ *NPRM* at ¶ 34.

¹¹ NTCA Comments at pp. 8-10; TransNexus Comments at pp. 7-11.

¹² USTelecom Comments at pp. 11-16; CTIA Comments at pp. 11-16.

call along its path. Third, passports are held in the STI-CPS network only for a very brief period of time (generally, 5-to-15 seconds), which means that a bad actor does not have the time or ability to overwhelm the network with multiple attempts to guess the required calling and called numbers but rather would be readily discovered and locked out by routine methods used to prevent denial of service attacks. Fourth, because the bad actor has to sign each request with a valid STI certificate, it is easy for the STI-CPS to identify it and take steps to limit both current and future access by it.¹³

CTIA also claims that the non-IP call authentication solutions should not be considered developed or reasonably available because they have not been as widely deployed as the IP STIR/SHAKEN standards at the time of adoption of the TRACED Act.¹⁴ However, “not widely deployed” is not the same as unavailable, which is the proper criteria.

Given that the criteria appear to be satisfied for the repeal of the statutory non-IP caller ID authentication deferral, WTA supports the proposed two-year period for companies to either migrate to IP technologies or adopt one of the specified non-IP frameworks,¹⁵ so long as the Commission incorporates a process to allow waivers if a company can demonstrate that it needs somewhat more time in order to complete the implementation of the non-IP framework or the

¹³ WTA 2023 Reply Comments in WC Docket No. 17-97, filed January 23, 2023, at pp. 7-8 (citations omitted). See also, TransNexus Comments at p. 16:

The ATIS-1000097.v003 technical report provides an analysis of the security risks associated with non-IP mechanisms. (citing “ATIS-1000097.v003, Annex A; ATIS-1000106. Note that the potential replay attack scenarios described in these reports would require the attacker to originate many calls, which could be detected by volumetric call monitoring, or make simultaneous calls using a callback feature, which would attempt to leverage a race condition. Possible, but difficult to achieve, and detectable by call analytics.”).

¹⁴ CTIA Comments at pp. 9-10. *Cf.*, Numeracle Comments at p. 4: (“Adoption has been slow due to a lack of a mandate and concerns about interoperability.”).

¹⁵ WTA has no objection to the suggestion of USTelecom at pp. 6-7 of its Comments proposing use of additional methods, including IPVS Traffic Exchange, to the extent such alternatives meet the same criteria. Solutions to the scourge of robocalling should be dynamic, not static.

transition to an all-IP network in an efficient and cost-effective manner.¹⁶ It is in the interest of rural carriers to implement a non-IP framework or IP technology as quickly as possible, because the rural carriers want to protect their customers and make sure their customers' calls get answered at the receiving end.¹⁷ But the Commission should not accelerate the transition period ahead of what is reasonable for a rural carrier, given the limited number of employees and much smaller budgets of those service providers. Thus, WTA disagrees with the American Bankers Association *et. al*, which suggested mandating that all carriers transition to IP networks,¹⁸ and additionally to impose a requirement for deployment of a non-IP solution in the meantime within one year (not two years).¹⁹ As mentioned above, while a transition to all-IP networks would be ideal, the TRACED Act incorporates non-IP solutions. And unless the Commission can provide or identify subsidies to pay for an accelerated IP transition, one-year will not be sufficient time for many small companies to implement fully-IP networks.

¹⁶ See also, Competitive Carrier Association Comments at pp. 3-4 (urging the FCC to provide greater flexibility to smaller and rural carriers on timing so as to accommodate transition to all IP networks); VON Coalition Comments at p. 3 (allow for waivers for providers that cannot meet the deadline). *But, cf.*, ZipDX Comments at p. 9 ("The Commission should not get distracted going down rabbit holes that impact a small population with a handful of calls. ... Urgency needs to be afforded to that which will have the biggest impact – the lowest-hanging fruit."). WTA disagrees with ZipDX to the extent it is suggesting that rural callers/receivers are not worthy of protection from robocalls or having legitimate calls blocked.

¹⁷ *Cf.*, AB Handshake Comments at p. 2:

Currently we see two critical gaps that limit the efficiency of the illegal robocall mitigation measures already in force. First, with respect to domestic traffic, non-IP U.S. telecommunications providers that cannot participate in the STIR/SHAKEN framework are in an unfavorable position because the legitimate traffic that they originate cannot receive an A or B level attestation regarding the caller's right to use the number in caller ID.

¹⁸ ABA Comments at pp. 2 & 6.

¹⁹ ABA Comments at p. 5.

In response to the *NPRM* question “does the Commission have discretion under the TRACED Act to continue the extension?”, TransNexus responded:

We know of no other factors for the Commission to consider before repealing the extension.

The TRACED Act says that “the Commission shall grant a delay of required compliance... until a call authentication protocol has been developed for calls delivered over non-internet protocol networks and is reasonably available.” Our understanding is that the word “shall” is used to indicate that an action is mandatory, not optional, and that it applies to both “grant” and “until.” Therefore, the Commission does not have the discretion to continue the extension after an effective non-IP call authentication protocol has been developed and is reasonably available.²⁰

While we agree with TransNexus that the Commission can and should now end the general non-IP statutory extension, we do not want the Commission to misinterpret TransNexus’ last sentence above to suggest that the Congressional directive to grant a delay until a non-IP protocol has been developed and is reasonably available limits the Commission’s ability to grant waivers and/or further extensions if particular circumstances warrant it. The Commission generally has authority to waive its rules “for good cause shown.”²¹ And more specifically, the TRACED Act in Section 5 provides the Commission with authority to delay implementation for small and rural service providers:

(5) EXTENSION OF IMPLEMENTATION DEADLINE.—

(A) BURDENS AND BARRIERS TO IMPLEMENTATION.—Not later than 12 months after the date of the enactment of this Act, *and as appropriate thereafter*, the Commission—

- (i) shall assess any burdens or barriers to the implementation required by paragraph (1), including—
 - (I) for providers of voice service to the extent the networks of such providers use time-division multiplexing;
 - (II) *for small providers of voice service and those in rural areas*; and

²⁰ TransNexus Comments at pp. 27-28.

²¹ 47 C.F.R. §1.3. *See also, Northeast Cellular Tel. Co., L.P. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“The FCC has authority to waive its rules if there is ‘good cause’ to do so.”).

(III) the inability to purchase or upgrade equipment to support the call authentication frameworks under this section, or lack of availability of such equipment; and

(ii) in connection with an assessment under clause (i), *may, upon a public finding of undue hardship, delay required compliance with the 18-month time period described in paragraph (1), for a reasonable period of time, for a provider or class of providers of voice service*, or type of voice calls, as necessary for that provider or class of providers or type of calls to participate in the implementation in order to address the identified burdens and barriers. (emphasis added).

Thus, the Commission can and should provide for waivers of the new two-year deadline upon an appropriate showing by small and rural carriers.

In sum, WTA supports the Commission's proposed decision to declare that the criteria are met for ending the non-IP exemption, and providing a two-year period to implement one of the non-IP frameworks or transition to an IP network, so long as the Commission also provides for waivers for small and rural companies upon a demonstration of good cause.

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
(202) 548-0202

/s/ Stephen L. Goodman
Stephen L. Goodman
Regulatory Counsel
400 Seventh Street, NW, Suite 406
Washington, DC 20004
(202) 607-6756

Date: August 15, 2025