

## VPS Consulting Memo

# STIR/SHAKEN: Originating Robocall Mitigation Plan Services

## Summary

STIR/SHAKEN requirements were initially slated to go into effect June 30, 2021. However, voice providers with fewer than 100,000 access lines were granted an automatic extension until June 30, 2023 to implement STIR/SHAKEN on the IP portions of their network. **Note that action is still required to comply during the extension period.**

## Deadlines & Requirements

- **June 30, 2023 deadline** – Small providers have a two-year extension to implement STIR/SHAKEN on IP portions of the network
- **June 30, 2021 deadline** – Certification for all providers as well as Certification along with robocall mitigation program details for those subject to the two-year extension
  - A Public Notice will be released no earlier than March 30, 2021 outlining the filing requirements
- **June 30, 2021 deadline** – Intermediate providers must implement STIR/SHAKEN on the IP portions of their network
  - For all authenticated caller ID SIP traffic received, required to pass any Identity header associated with the call, unaltered, to the subsequent provider in the call path
  - For all unauthenticated caller ID SIP traffic received, required to authenticate that call with “gateway” or “C”-level attestation before passing to the subsequent provider in the call path
- **Non-IP networks (or portions thereof)** – continued extension but must maintain documented proof that service provider is participating (either directly or via a representative) on a working group to develop non-IP caller identification solution.

## Robocall Mitigation Compliance Options

Many providers are working to implement a solution with limited time. We believe it is important to note that options are available for the Originating Robocall Mitigation Program requirement.

- Vantage Point is developing an economical, originating robocall mitigation program that may be ideal for many providers. The goal is to develop a program that many providers can implement internally, without recurring costs. We expect to have the program developed around April 1, 2021 and will provide more detailed information in the coming weeks.
- For providers who would prefer a robust, feature-rich Originating/Terminating Robocall Mitigation Plan solution, several reputable industry vendors are providing such and we would be happy to work with the vendors on your behalf or provide you contact information.

## Additional Information

For information on this issue or if you would like VPS guidance, please contact these members of the Vantage Point Solutions team:

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