VPS Memo

STIR/SHAKEN and Robocall Mitigation

NEW FCC ORDER RELEASED MARCH 17, 2023.

The FCC released an Order on March 17, 2023 designed to bolster the existing STIR/SHAKEN and Robocall Mitigation Database (RMD) and Robocall Mitigation Program requirements.

The new requirements will affect **ALL** voice providers. If VPS assisted with your initial Robocall Mitigation Database/Program filing, we will reach out to you directly via email as things progress with this Order to ensure continued compliance. If VPS did not assist with your initial RMD/Program filing, we stand ready to assist.

Background

As a recap, most providers were required to (1) file a Robocall Mitigation Certification in the RMD and (2) file a Robocall Mitigation Program in the RMD if the provider was not 100% STIR/SHAKEN compliant, back by June 30, 2021. Traffic originated via TDM technology was granted a continued extension until the industry establishes a TDM equivalent STIR/SHAKEN solution. Small providers were also granted a two-year extension until June 30, 2023, to deploy STIR/SHAKEN on the IP portions of their network.

New Order Details

Non-Gateway Intermediate Providers

Effective December 31, 2023, the first non-gateway intermediate provider in the call path must utilize STIR/SHAKEN to authenticate unauthenticated calls that it receives.

All Providers Must File in the Robocall Mitigation Database

Previously, providers that lacked the network infrastructure to implement STIR/SHAKEN, intermediate providers, and those that certified 100% STIR/SHAKEN compliant, were not required to file Robocall Mitigation Programs in the RMD. The FCC now extends the following requirements to **ALL** providers, regardless of their STIR/SHAKEN implementation status, extension status or network infrastructure.

1. Take reasonable steps to mitigate illegal robocall traffic
2. Submit a certification in the Robocall Mitigation Database
3. Submit a Robocall Mitigation Program in the RMD

Robocall Mitigation Database Updates

In addition to the existing RMD required details, the FCC now mandates that providers certify/provide the following:

- Call Chain Role
- STIR/SHAKEN Extension Details
- Not Prohibited from Filing in RMD Attestation
- Regulatory Action or Investigation Attestation
- OCN (if applicable)

Additional Robocall Mitigation Program Details

In addition to the previous Robocall Mitigation Program required details, the FCC now mandates that the Program "describe in particularity":

1. **New and Renewing Customers** – Explain how the provider is meeting their obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal robocalls.
2. **Know-Your-Upstream-Provider** – Non-gateway intermediate providers and voice service providers must describe any "know-your-upstream provider" procedures in place designed to mitigate illegal robocalls.
3. **Call Analytics** – Describe any call analytics systems used to identify and block illegal traffic. If a third-party vendor is used, provide the vendor name(s).

Blocking of Traffic

All downstream providers are required to block traffic received directly from all intermediate and non-gateway intermediate providers that are not in the Robocall Mitigation Database.

Robocall Mitigation Database & Program Filing Deadline

The FCC directs the Wireline Competition Bureau to release a Public Notice once OMB has approved the Order. The Public Notice will outline effective dates and filing deadlines. Given the industry's push to address the illegal robocall issue, VPS expects to see fairly quick movement on this over the next several months.

Additional Information

Existing RMD participants need to remain focused on the upcoming June 30, 2023 deadline to implement STIR/SHAKEN on the IP portions of the network and update the Robocall Mitigation Database if applicable.

Please contact one of the following VPS team members with any questions or concerns:

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