

VPS Memo

Caller ID Authentication Second Report & Order

ALSO KNOWN AS STIR/SHAKEN

Summary

Overview

The FCC released its Second Report and Order on caller ID authentication requirements also known as STIR/SHAKEN on October 1, 2020. A few of the Order highlights are the extension of the STIR/SHAKEN implementation deadline from June 30, 2021 to June 30, 2023 for all small voice service providers (100,000 or fewer voice lines, including all affiliates), establishment of a robocall mitigation program and certification, and STIR/SHAKEN requirement for all IP portions of intermediate providers network by June 30, 2021.

Background

In an effort to implement the TRACED Act and combat unwanted and illegal robocalls, several working groups developed standards to allow the authentication and verification of caller ID information for calls carried over IP networks. While the Secure Telephony Identify Revisited (STIR) working group produced protocols for authenticating caller ID information, other working groups produced the Signature-based Handling of Asserted information using toKENs (SHAKEN). STIR is the industry protocol of verifying that the call is legitimate, SHAKEN is the process to “sign off” on the call for downstream carriers.

All service providers including those small voice providers subject to the two-year extension must implement a robocall mitigation program and certify to such via an FCC portal by June 30, 2021. A Public Notice will be released no earlier than March 30, 2021 outlining the filing requirements. The FCC has left the program requirements vague so providers can develop a program based off each provider’s size and need. The program should outline detailed practices and steps taken to significantly reduce the origination of illegal robocalls. Implementing red flags such as traffic patterns for short durations or low completion rates are items that could be included in the program. Thirty days after June 30, 2021, providers and intermediate providers can only accept calls from carriers

that have a certification filing in the Robocall Mitigation Database. Providers will need to certify that their traffic is either “signed with STIR/SHAKEN or...subject to a robocall mitigation program” or a mixture of both. The certification will also include:

1. Provider’s business name and address.
2. Other business names in use by the provider.
3. All business names previously used by the provider.
4. Whether the provider is a foreign voice service provider.
5. The name, title, department, business address, telephone number, and email address of the provider’s primary robocall mitigation contact.

The FCC also confirmed that voice Service Providers are prohibited from charging end users for the caller ID authentication technology.

What the Order Will Require:

- 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 and Certification along with robocall mitigation program details for those subject to the two-year extension.
- 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.

Additional Information

The link to the full FCC Order is here:

<https://docs.fcc.gov/public/attachments/FCC-20-136A1.pdf>

As you can see, a lot of changes will be coming down the pike in the next few years. For more information on this issue or if you would like VPS guidance, please contact the following members of the Vantage Point Solutions team:

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