Description of document:	Federal Communications Commission (FCC) Briefings to Congressional Offices about robocalls and SHAKEN/STIR anti-robocall measures, 2020-2021
Requested date:	2021
Release date:	20-September-2021
Posted date:	11-July-2022
Source of document:	Freedom of Information Act Request Federal Communications Commission 45 L Street NE Washington, D.C. 20554 FOIAonline

Federal Communications Commission
Office of Legislative Affairs
Washington, DC 20554

Office of the Director

September 20, 2021

VIA ELECTRONIC MAIL

Re: FOIA Control No. 2021-656

This letter responds to your Freedom of Information Act (FOIA) request for "[a] copy of each 'Hill' briefing or presentation to Congressional Offices regarding the SHAKEN/STIR Caller ID authentication framework and/or its effectiveness/impact in reducing Robocalls" during calendar years 2020 and 2021. You also requested "a copy of any communications with the primary House Committee that oversees the FCC and/or the primary Senate Committee that oversees the FCC regarding the effectiveness of the SHAKEN/STIR Caller ID authentication framework."

Your request has been assigned FOIA Control No. 2021-656. The Office of Legislative Affairs has searched for responsive records and located 71 pages of records that are responsive to your request. Of the 71 pages of responsive records located, 69 pages are produced here. The remaining 2 pages are withheld in full due to the reasons discussed below. Additionally, some material on the pages produced has been redacted due to the reasons discussed below.

Records responsive to your request were withheld under FOIA Exemption 5.[1] Exemption 5 protects certain inter-agency and intra-agency records that are normally considered privileged in the civil discovery context. Exemption 5 encompasses a deliberative process privilege intended to "prevent injury to the quality of agency decisions."[2] To fall within the scope of this privilege the agency records must be both predecisional and deliberative.[3] Predecisional records must have been "prepared in order to assist an agency decision maker in arriving at his decision."[4] Deliberative records must be such that their disclosure "would expose an agency's decisionmaking process in such a way as to discourage candid discussion within the agency and thereby undermine the agency's ability to perform its functions."[5] The emails that are withheld encompass a discussion relating to the TRACED Act involving employees of the Federal Communications Commission.

---

[1] 5 U.S.C. § 552(b)(5).

[2] *NLRB v. Sears Roebuck & Co.*, 421 U.S. 132, 151 (1975).

[3] *Id.* at 151-52.

[4] *Formaldehyde Inst. v. Dep't of Health and Human Servs.*, 889 F.2d 1118, 1122 (D.C. Cir. 1989); *see also Coastal States Gas Corp. v. Dep't of Energy*, 617 F.2d 854, 866 (D.C. Cir. 1980) ("In deciding whether a document should be protected by the privilege we look to whether the document is . . . generated before the adoption of an agency policy and whether . . . it reflects the give-and-take of the consultative process. The exemption thus covers recommendations, draft documents, proposals, suggestions, and other subjective documents . . .").

[5] *Formaldehyde Inst.*, 889 F.2d at 1122 (quoting *Dudman Commc'ns Corp. v. Dep't of the Air Force*, 815 F.2d 1565, 1568 (D.C. Cir. 1987)).

We have determined that it is reasonably foreseeable that disclosure would harm the agency's decision making processes, which Exemption 5 is intended to protect.

We are required by both the FOIA and the Commission's own rules to charge requesters certain fees associated with the costs of searching for, reviewing, and duplicating the sought after information.[6] To calculate the appropriate fee, requesters are classified as: (1) commercial use requesters; (2) educational requesters, non-commercial scientific organizations, or representatives of the news media; or (3) all other requesters.[7]

Pursuant to section 0.466(a)(8) of the Commission's rules, you have been classified for fee purposes under category (3) as an "all other requester."[8] As an "all other requester," the Commission assesses charges to recover the full, reasonable direct cost of searching for and reproducing records that are responsive to the request; however, you are entitled to be furnished with the first 100 pages of reproduction and the first two hours of search time without charge under section 0.470(a)(3)(i) of the Commission's rules.[9] The response to your request required less than two hours of search time, and did not involve more than 100 pages of duplication. Therefore, you will not be charged any fees.

If you consider this to be a denial of your FOIA request, you may seek review by filing an application for review with the Office of General Counsel. An application for review must be *received* by the Commission within 90 calendar days of the date of this letter.[10] You may file an application for review by mailing the application to Federal Communications Commission, Office of General Counsel, 45 L Street NE, Washington, DC 20554, or you may file your application for review electronically by e-mailing it to FOIA-Appeal@fcc.gov. Please caption the envelope (or subject line, if via e-mail) and the application itself as "Review of Freedom of Information Action."

If you would like to discuss this response before filing an application for review to attempt to resolve your dispute without going through the appeals process, you may contact the Commission's FOIA Public Liaison for assistance at:

FOIA Public Liaison
Federal Communications Commission, Office of the Managing Director, Performance Evaluation and Records Management
45 L Street NE, Washington, DC 20554
202-418-0440
FOIA-Public-Liaison@fcc.gov

If you are unable to resolve your FOIA dispute through the Commission's FOIA Public Liaison, the Office of Government Information Services (OGIS), the Federal FOIA Ombudsman's office, offers mediation services to help resolve disputes between FOIA requesters and Federal agencies. The contact information for OGIS is:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road–OGIS
College Park, MD 20740-6001
202-741-5770
877-684-6448
ogis@nara.gov

---

[6] *See* 5 U.S.C. § 552(a)(4)(A); 47 CFR § 0.470.

[7] 47 CFR § 0.470.

[8] 47 CFR § 0.466(a)(8).

[9] 47 CFR § 0.470(a)(3)(i).

[10] 47 CFR §§ 0.461(j), 1.115; 47 CFR § 1.7 (documents are considered filed with the Commission upon their receipt at the location designated by the Commission).

https://www.archives.gov/

If you have any questions, please contact Alethea Lewis at (202) 418-1900.

Sincerely,

James F. Balaguer
Deputy Director

Enclosures

cc: FCC FOIA Office

STIR/SHAKEN

Caller ID Authentication

Matthew Collins
Assistant Chief
Competition Policy Division
Wireline Competition Bureau

June 9, 2020

The Problem

- "Spoofing" caller ID for unlawful purposes
  - -Spoofing can have positive uses
    - Doctors
    - Complex calling models
  - - Spoofing or falsifying caller ID information can be abused or malicious
    - Spoofing prominent numbers
    - Neighbor spoofing

- Impact of Internet Protocol (IP)-based telephony
  - - Transition to IP has had many benefits, including increased competition
  - - Has made it easier to make phone calls, and to spoof caller ID
  - - More providers also means less trust built into the system

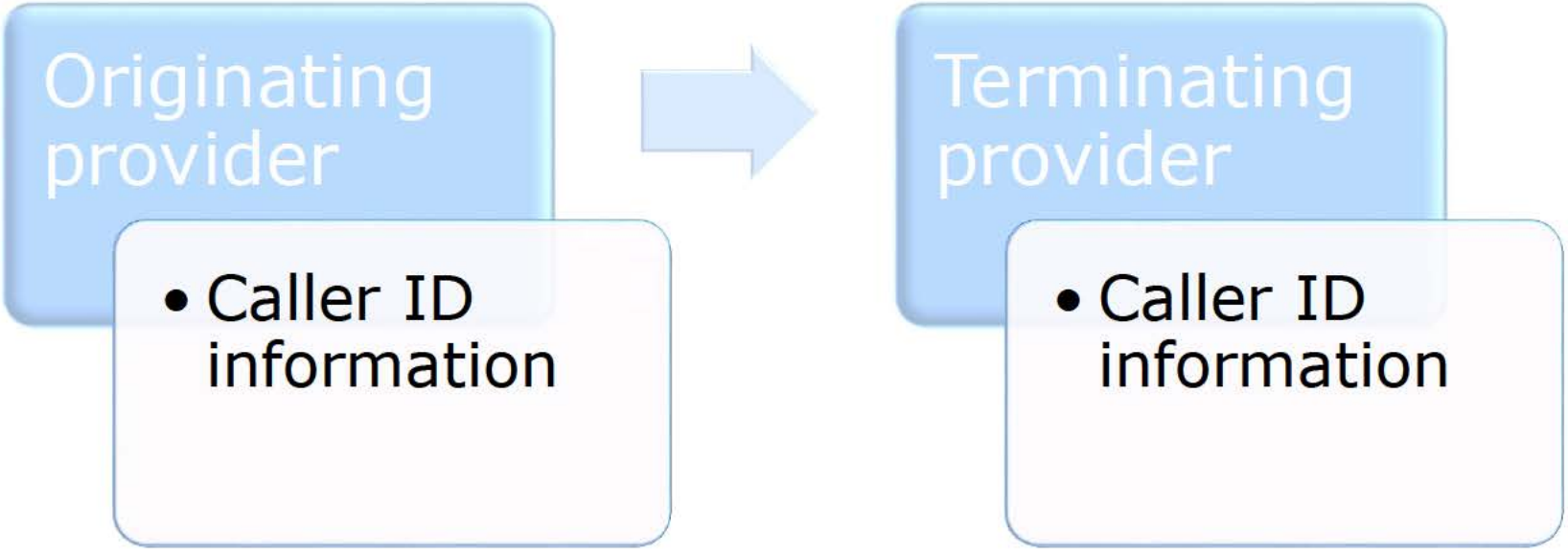
A Tool to Address the Problem: STIR/SHAKEN

- What is STIR/SHAKEN?
  - A technological framework for IP networks that allows for the authentication of caller ID information
  - By authenticating the caller ID information transmitted with a call, it puts trust back in the infrastructure itself

- Who designed STIR/SHAKEN?
  - STIR – Secure Telephony Identity Revisited
    - Internet Engineering Task Force (IETF) working group
    - Produced protocols for authenticating caller ID information
  - SHAKEN – Signature-based Handling of Asserted information using toKENs
    - Alliance of Telecommunications Industry Solutions (ATIS) and the Session Initiation Protocol (SIP) Forum
    - Standardize how STIR protocols are implemented in practice

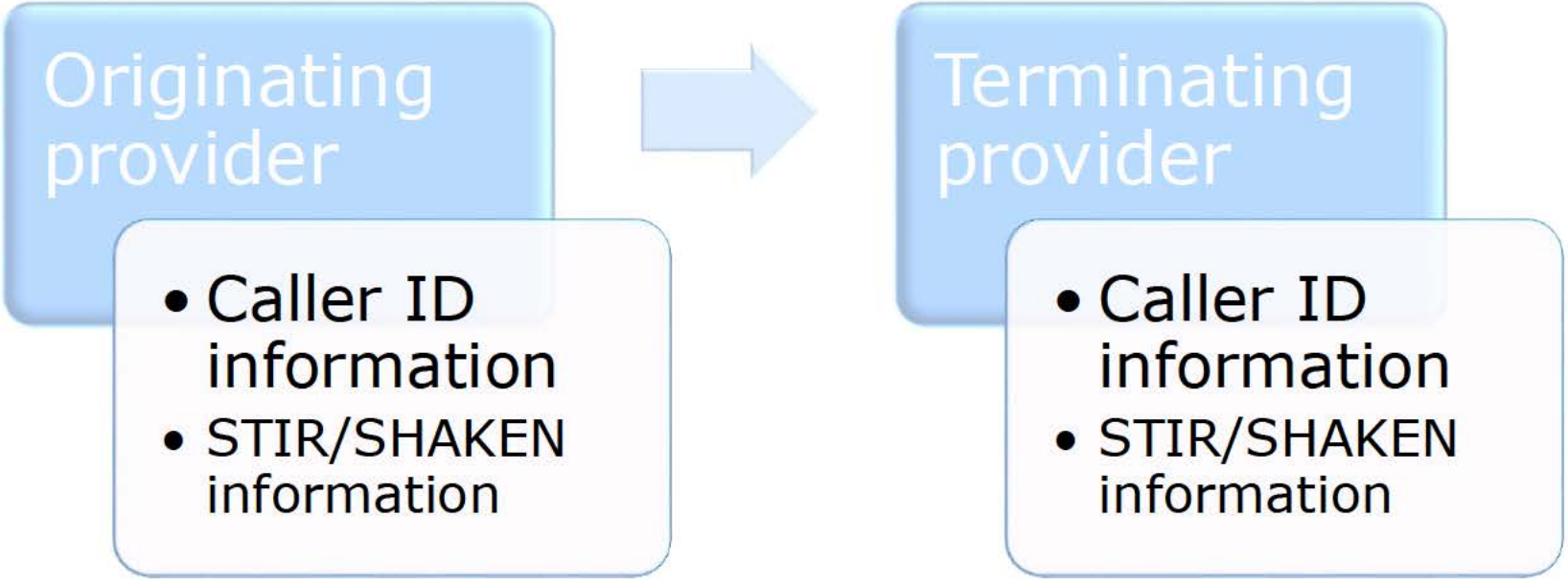
A Tool to Address the Problem: STIR/SHAKEN (cont'd)

- How does STIR/SHAKEN work?
  - Two components: technical process of authenticating and verifying caller ID information and social process of ensuring trust in authentication and verification
  - Technical process



A Tool to Address the Problem: STIR/SHAKEN (cont'd)

- How does STIR/SHAKEN work?
  - Technical process



  - STIR/SHAKEN information includes:
    - Encrypted caller ID information
    - Originating provider ID
    - Attestation level – A, B, C
    - Certificate

A Tool to Address the Problem: STIR/SHAKEN (cont'd)

- How does STIR/SHAKEN work?
  - Social process
    - Certificate says the originating provider is who it claims to be
    - The assignment and management of certificates is governed by an industry-led governance system

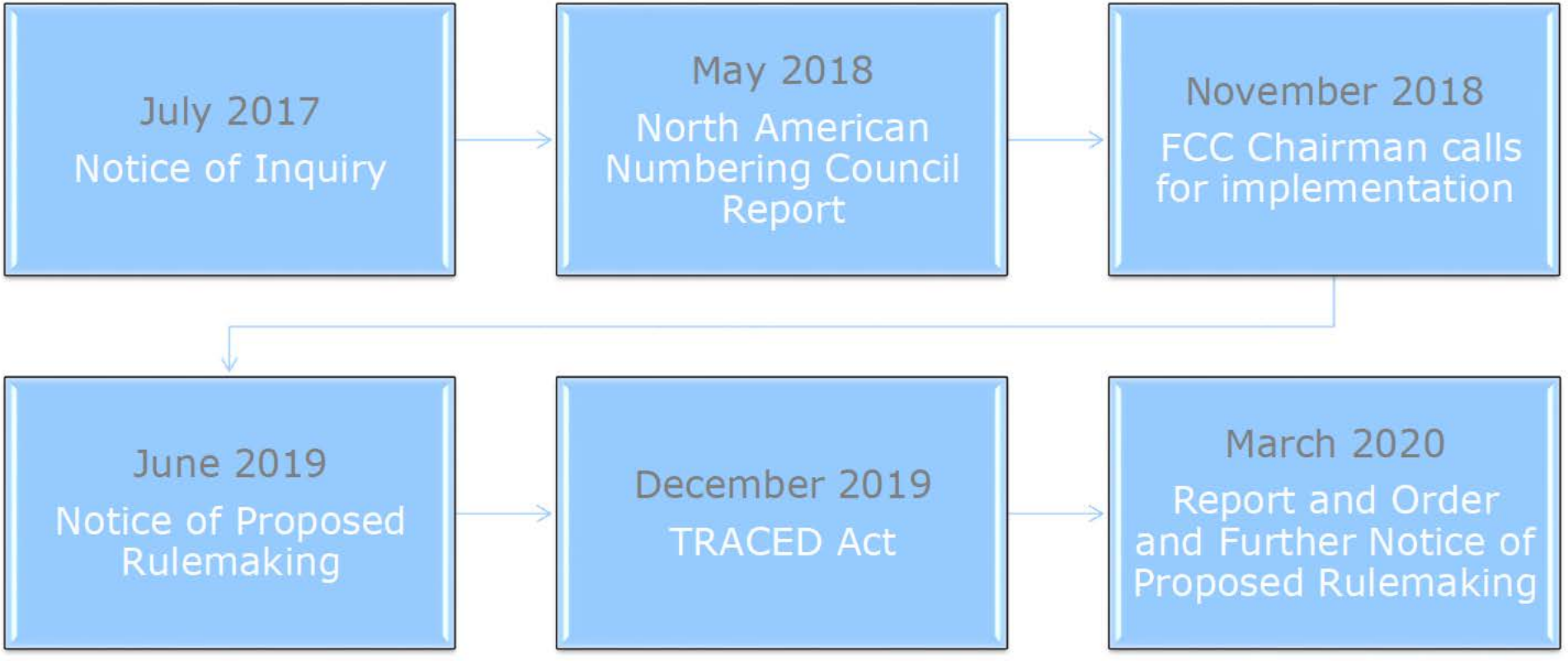
https://www.atis.org/sti-ga/

https://authenticate.iconectiv.com/

A Tool to Address the Problem: STIR/SHAKEN (cont'd)

- How does STIR/SHAKEN help?
  - If a call fails verification, high likelihood it is maliciously spoofed
    - Share information with subscriber
    - Block the call
  - Provides useful information for call analytics
    - Information
      - Where the call originated or entered the domestic IP network
      - What attestation level the call received
    - Uses
      - Promotes "traceback" efforts
      - Identify unusual behavior
- Open issues
  - Application of STIR/SHAKEN to certain unique calling cases
  - Caller ID authentication on non-IP networks
  - Cross-border caller ID authentication

FCC Action to Promote STIR/SHAKEN Implementation



TRACED Act and STIR/SHAKEN

- Directs FCC to do the following:
- Require voice service providers to implement STIR/SHAKEN by June 30, 2021
  - Caveats
    - Extension in compliance if FCC determines it would present an undue hardship
      - Providers with extension must implement robocall mitigation
    - Exemption process for providers that the FCC determines have achieved certain implementation benchmarks by Dec 30, 2020
- Prohibit voice service providers from adding a line item charge for caller ID authentication
- Require voice service providers to take reasonable measures to implement a caller ID authentication framework on non-IP parts of network

March 2020 Report and Order and FNPRM

- Report and Order – establishes:
  - Voice service providers must implement STIR/SHAKEN
    - Limited to IP parts of network
    - Requirement goes into effect June 30, 2021
- Further Notice of Proposed Rulemaking – proposes:
  - Granting a one-year extension for small voice service providers
  - Establishing certification process for providers that seek exemption
  - Prohibiting providers from adding line item charge for caller ID authentication
  - Requiring providers with non-IP network technology to either:
    - Upgrade network and implement STIR/SHAKEN, or
    - Work to develop a non-IP caller ID authentication solution
  - Extending the STIR/SHAKEN implementation mandate to intermediate providers

Next Steps

- Reviewing the record in response to March Further Notice of Proposed Rulemaking

- Exemption determinations
  - TRACED Act requires determinations by Dec 30, 2020

- STIR/SHAKEN implementation mandate
  - Goes into effect June 30, 2021

Contact

- **Contact Information**
  - Matthew Collins
    - (202) 418-7141
    - matthew.collins@fcc.gov

Federal Communications Commission
Office of Legislative Affairs
Washington, D.C.20554

Office of the Director

December 29, 2020

The Honorable Frank Pallone
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Pallone:

As required by Section 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019), enclosed please find a report prepared by the Federal Communications Commission's Wireline Competition Bureau. This report provides a status update on the implementation of the STIR/SHAKEN authentication framework and an assessment of the efficacy of such framework.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Paul A. Jackson
Director

Enclosure

Federal Communications Commission
Office of Legislative Affairs
Washington, D.C.20554

Office of the Director

December 29, 2020

The Honorable Greg Walden
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Congressman Walden:

As required by Section 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019), enclosed please find a report prepared by the Federal Communications Commission's Wireline Competition Bureau. This report provides a status update on the implementation of the STIR/SHAKEN authentication framework and an assessment of the efficacy of such framework.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Paul A. Jackson
Director

Enclosure

Federal Communications Commission
Office of Legislative Affairs
Washington, D.C.20554

Office of the Director

December 29, 2020

The Honorable Mike Doyle
Chairman
Subcommittee on Communications and Technology
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Doyle:

As required by Section 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019), enclosed please find a report prepared by the Federal Communications Commission's Wireline Competition Bureau. This report provides a status update on the implementation of the STIR/SHAKEN authentication framework and an assessment of the efficacy of such framework.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Paul A. Jackson
Director

Enclosure

Federal Communications Commission
Office of Legislative Affairs
Washington, D.C.20554

Office of the Director

December 29, 2020

The Honorable Robert Latta
Ranking Member
Subcommittee on Communications and Technology
Committee on Energy and Commerce
Washington, D.C. 20515

Dear Congressman Latta:

As required by Section 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019), enclosed please find a report prepared by the Federal Communications Commission's Wireline Competition Bureau. This report provides a status update on the implementation of the STIR/SHAKEN authentication framework and an assessment of the efficacy of such framework.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Paul A. Jackson
Director

Enclosure

Federal Communications Commission
Office of Legislative Affairs
Washington, D.C.20554

Office of the Director

December 29, 2020

The Honorable Roger Wicker
Chairman
Committee on Commerce, Science and Transportation
United States Senate
Washington, D.C. 20510

Dear Chairman Wicker:

As required by Section 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019), enclosed please find a report prepared by the Federal Communications Commission's Wireline Competition Bureau. This report provides a status update on the implementation of the STIR/SHAKEN authentication framework and an assessment of the efficacy of such framework.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Paul A. Jackson
Director

Enclosure

Federal Communications Commission
Office of Legislative Affairs
Washington, D.C.20554

Office of the Director

December 29, 2020

The Honorable Maria Cantwell
Ranking Member
Committee on Commerce, Science and Transportation
United States Senate
Washington, D.C. 20510

Dear Senator Cantwell:

As required by Section 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019), enclosed please find a report prepared by the Federal Communications Commission's Wireline Competition Bureau. This report provides a status update on the implementation of the STIR/SHAKEN authentication framework and an assessment of the efficacy of such framework.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Paul A. Jackson
Director

Enclosure

Federal Communications Commission
Office of Legislative Affairs
Washington, D.C.20554

Office of the Director

December 29, 2020

The Honorable John Thune
Chairman
Subcommittee on Communications, Technology and the Internet
Committee on Commerce, Science and Transportation
United States Senate
Washington, D.C. 20510

Dear Chairman Thune:

As required by Section 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019), enclosed please find a report prepared by the Federal Communications Commission's Wireline Competition Bureau. This report provides a status update on the implementation of the STIR/SHAKEN authentication framework and an assessment of the efficacy of such framework.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Paul A. Jackson
Director

Enclosure

Federal Communications Commission
Washington, D.C. 20554

December 29, 2020

The Honorable Brian Schatz
Ranking Member
Subcommittee on Communications, Technology and Internet
Committee on Commerce, Science and Transportation
United States Senate
Washington, D.C. 20510

Dear Senator Schatz:

As required by Section 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019), enclosed please find a report prepared by the Federal Communications Commission's Wireline Competition Bureau. This report provides a status update on the implementation of the STIR/SHAKEN authentication framework and an assessment of the efficacy of such framework.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Paul A. Jackson
Director
Office of Legislative Affairs

Enclosure

REPORT TO CONGRESS

ON

CALLER ID AUTHENTICATION IMPLEMENTATION PROGRESS

Prepared by the:
Wireline Competition Bureau

Submitted to the:
United States Congress pursuant to Section 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act

December 29, 2020

I. INTRODUCTION

In this Report, the Wireline Competition Bureau (Bureau) reports to Congress on progress made by voice service providers to implement caller ID authentication technology on their voice networks, as directed by section 4(b)(3) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.[1] To combat illegal caller ID spoofing, and consistent with the TRACED Act, the Commission has required that all voice service providers implement the STIR/SHAKEN caller ID authentication framework in their Internet Protocol (IP) networks and take reasonable measures to implement a caller ID authentication solution for non-IP networks by June 30, 2021.[2] And as directed by the TRACED Act,[3] the Commission—via the Bureau—has exempted eligible voice service providers from these implementation mandates on the basis that they meet the early implementation benchmarks laid out in that Act.[4] The Bureau now issues this Report, fulfilling congressional direction to report on these exemption determinations and voice service provider progress in implementing caller ID authentication technology.[5]

II. BACKGROUND

Unwanted calls are the number one consumer complaint to the Commission.[6] Illegal robocalls accompanied by illegal caller ID spoofing—whereby bad actors falsify caller ID information to deceive call recipients into believing they are trustworthy—are particularly problematic; such calls are not only a nuisance but also expose Americans to fraudulent schemes.[7] This problem has become even more relevant during this time of economic turmoil and pandemic, with bad actors preying on Americans' fears about COVID-19 and spreading misinformation about false treatments and cures.[8] The Commission has made tackling illegal robocalling and associated spoofing its top consumer protection priority and continues to work with a variety of stakeholders and government partners to end the scourge of illegal robocalls.[9]

---

[1] TRACED Act § 4(b)(3) (directing the Commission to provide "a report on [its exemption determinations], which shall include an analysis of the extent to which providers of voice service have implemented" the STIR/SHAKEN authentication framework in the Internet Protocol (IP) portion of their networks and an effective call authentication framework in the non-IP portion of their networks, "including whether the availability of necessary equipment and equipment upgrades has impacted such implementation; and an assessment of the efficacy of [STIR/SHAKEN and any effective non-Internet Protocol call authentication framework] in addressing all aspects of call authentication").

[2] TRACED Act §§ 4(b)(1)(A)-(B); *Call Authentication Trust Anchor*, WC Docket No. 17-97, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, 3252, paras. 24-25 (2020) (*First Report and Order and Further Notice*); *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, FCC 20-136, at 13, para. 24 (Oct. 1, 2020) (*Second Report and Order*).

[3] TRACED Act § 4(b)(2)

[4] *Wireline Competition Bureau Announces Seven Voice Service Providers Qualified for STIR/SHAKEN Exemption*, WC Docket Nos. 17-97 and 20-68, Public Notice, DA 20-1533 (WCB Dec. 23, 2020) (*Exemption Determinations Public Notice*).

[5] TRACED Act § 4(b)(3).

[6] FCC, *The FCC's Push to Combat Robocalls & Spoofing*, https://www fcc.gov/spoofed-robocalls (last visited Nov. 23, 2020).

[7] *See First Report and Order and Further Notice*, 35 FCC Rcd at 3263, para. 48 (estimating that fraudulent robocall schemes cost Americans an estimated $10.5 billion annually).

[8] *See* FCC, *COVID-19 Robocall Scams*, https://www.fcc.gov/covid-19-robocall-scams (last visited Nov. 23, 2020).

[9] *See, e.g.*, FCC, Call Blocking Tools Now Substantially Available to Consumers: Report on Call Blocking at 3 (2020), https://docs fcc.gov/public/attachments/DOC-365152A1.pdf (*FCC Call Blocking Report*).

One part of the Commission's multi-pronged approach to combatting illegal spoofing is caller ID authentication technology, and specifically the STIR/SHAKEN caller ID authentication framework.[10] Caller ID authentication allows voice service providers to authenticate (when originating) and verify (when terminating) the caller ID information transmitted with phone calls.[11] Widespread implementation of caller ID authentication will reduce the effectiveness of illegal spoofing, allow law enforcement to identify bad actors more easily, and help voice service providers identify calls with illegally spoofed caller ID information before those calls reach their subscribers.[12]

STIR/SHAKEN. Technologists from the Internet Engineering Task Force and the Alliance for Telecommunications Industry Solutions (ATIS), both industry standards bodies, designed the STIR/SHAKEN framework, which allows voice service providers to authenticate and verify caller ID information for calls carried over IP networks.[13] STIR/SHAKEN employs public key cryptography to securely transmit the information that the originating provider knows about the identity of the caller and the caller's relationship to the phone number it is using.[14] Providers transmit this information in an "Identity header" along with the call through the entire call path, which allows the terminating provider to verify the information on the other end.[15]

STIR/SHAKEN relies on digital "certificates" issued by a neutral governance system to authorized voice service providers to ensure trust. The voice service provider adding the Identity header includes its assigned certificate which says, in essence, that the voice service provider is the entity it claims to be and that it has the right to authenticate the caller ID information.[16] The STIR/SHAKEN governance system consists of the Governance Authority, which defines the policies and procedures for which entities can issue or acquire certificates;[17] the Policy Administrator, which applies those rules and confirms that voice service providers are authorized to request and receive certificates;[18] and Certification Authorities, which issue the certificates themselves.[19] After registering with, and receiving authorization

---

[10] STIR/SHAKEN is an acronym which stands for Secure Telephone Identity Revisited—a working group formed by the Internet Engineering Task Force that produced several protocols for authenticating caller ID information—and Signature-based Handling of Asserted information using toKENs—a specification that standardizes how the protocols produced by STIR are implemented across the industry using digital "certificates." *See* IETF, *Secure Telephone Identity Revisited (stir): About*, https://datatracker.ietf.org/wg/stir/about (last visited Dec. 8, 2020) (describing IETF STIR standards and efforts); ATIS & SIP Forum, Joint ATIS/SIP Forum Standard—Signature-Based Handling of Asserted Information Using toKENs (SHAKEN), ATIS-1000074 (2017), https://access.atis.org/apps/group_public/download.php/46770/ATIS-1000074-E.zip (ATIS-1000074).

[11] Neustar, *STIR/SHAKEN Q&A: Restoring Trust in Calls*, https://www.home.neustar/resources/faqs/stir-shaken-q-and-a (last visited Nov. 25, 2020).

[12] *Second Report and Order* at 3, para. 3.

[13] Neustar, *STIR/SHAKEN Q&A: Restoring Trust in Calls*, https://www.home.neustar/resources/faqs/stir-shaken-q-and-a (last visited Nov. 25, 2020).

[14] *Second Report and Order* at 5, para. 8.

[15] *Id.*

[16] *First Report and Order and Further Notice*, 35 FCC Rcd at 3246, para. 9.

[17] This role is currently filled by the Secure Telephone Identity Governance Authority (STI-GA). Secure Telephone Identity Governance Auth., *STI Governance Authority*, https://sti-ga.atis.org (last visited Dec. 8, 2020).

[18] The Governance Authority selected iconectiv to fill this role. Press Release, ATIS, Mitigating Illegal Robocalling Advances with Secure Telephone Identity Governance Authority Board's Selection of iconectiv as Policy Administrator (May 30, 2019), https://www.atis.org/press-releases/mitigating-illegal-robocalling-advances-with-secure-telephone-identity-governance-authority-boards-selection-of-iconectiv-as-policy-administrator.

[19] At the time of this Report, the Policy Administrator, iconectiv, has approved five certification authorities. *See* iconectiv, *Approved Certification Authorities*, https://authenticate.iconectiv.com/approved-certification-authorities (last visited Dec. 8, 2020).

from, the Policy Administrator, a voice service provider may receive its certificate from a Certification Authority and begin participating in the exchange of traffic with caller ID information that has been authenticated consistent with STIR/SHAKEN. Thus, to participate in STIR/SHAKEN, a voice service provider must not only complete necessary upgrades to its network infrastructure to be able to authenticate and verify caller ID information; it must also complete registration through the governance system.[20]

Non-IP Caller ID Authentication. As the transition to all IP networks remains ongoing, many voice service providers continue to use legacy networks that cannot support IP-based SIP signaling, which is necessary for STIR/SHAKEN to function.[21] Standards bodies are currently working on developing non-IP caller ID authentication solutions,[22] and some vendors are developing potential solutions.[23] However, there is not yet an industry consensus on the path forward.[24] One technology currently in development is "out-of-band STIR." While STIR/SHAKEN relies on caller ID authentication information transmitted *along with* the call throughout the call path, out-of-band STIR permits authentication information to be sent separately across the Internet, *out-of-band* from the call path.[25] Industry stakeholders have widely divergent views as to the viability of out-of-band STIR as a method of effective caller ID authentication in non-IP networks.[26]

Commission Action to Date. The Commission has been promoting caller ID authentication and the STIR/SHAKEN framework for over three years. In July 2017, the Commission released a *Notice of Inquiry*, launching a broad examination of STIR/SHAKEN and how to expedite its development and implementation,[27] and in April 2018, the North American Numbering Council recommended a timeline and milestones for industry deployment of STIR/SHAKEN.[28]

In June 2019, the Commission adopted a *Declaratory Ruling and Third Further Notice of Proposed Rulemaking* that, among other things, proposed and sought comment on mandating implementation of STIR/SHAKEN.[29] In December 2019, Congress enacted the TRACED Act, which directed the Commission to require, no later than June 30, 2021, all voice service providers to (1)

---

[20] *See Second Report and Order* at 56, para. 113; *see also First Report and Order and Further Notice*, 35 FCC Rcd at 3257, para. 32.

[21] *See Second Report and Order* at 5, para. 9.

[22] *See* Press Release, ATIS, ATIS Launches New Non-IP Call Authentication Task Force (May 13, 2020), https://sites.atis.org/insights/atis-launches-new-non-ip-call-authentication-task-force; IETF, *STIR Out-of-Band Architecture and Use Cases*, Draft (2019), https://tools.ietf.org/html/draft-ietf-stir-oob-06 (draft standards for out-of-band STIR); *see also, e.g.*, INCOMPAS Comments at 2; Lumen Comments at 4; USTelecom Reply at 3.

[23] *See* TransNexus, *Out-of-Band STIR/SHAKEN Call Authentication*, https://transnexus.com/whitepapers/out-of-band-stir (last visited Dec. 10, 2020).

[24] *See, e.g.*, Comcast Comments, WC Docket Nos. 17-97 and 20-67, at 5 (rec. May 15, 2020).

[25] TransNexus, *Out-of-Band STIR/SHAKEN Call Authentication*, https://transnexus.com/whitepapers/out-of-band-stir (last visited Dec. 10, 2020).

[26] NTCA Comments at 9.

[27] *Call Authentication Trust Anchor*, WC Docket No. 17-97, Notice of Inquiry, 32 FCC Rcd 5988 (2017).

[28] Call Authentication Trust Anchor Working Grp., North American Numbering Council, Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR (2018), http://nanc-chair.org/docs/mtg_docs/May_18_Call_Authentication_Trust_Anchor_NANC_Final_Report.pdf.

[29] *Advanced Methods to Target and Eliminate Unlawful Robocalls*; *Call Authentication Trust Anchor*, CG Docket No. 17-59 and WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, 34 FCC Rcd 4876 (2019).

implement STIR/SHAKEN in the IP portions of their networks and (2) take reasonable measures to implement an effective caller ID authentication framework in the non-IP portions of their networks.[30]

On March 30, 2020, the Commission adopted a *Report and Order and Further Notice of Proposed Rulemaking* (*First Report and Order and Further Notice*) which required all voice service providers to implement STIR/SHAKEN in the IP portions of their networks by June 30, 2021, and proposed additional measures to combat illegal spoofing, including further implementation of the provisions of the TRACED Act related to caller ID authentication.[31] On September 29, 2020, the Commission adopted a *Second Report and Order* which set forth additional rules to make clear the obligations and deadlines for voice service providers regarding caller ID authentication and completed implementation of the caller ID authentication provisions of the TRACED Act.[32]

In the *Second Report and Order*, the Commission made two determinations particularly relevant to this Report. First, the Commission found that no effective caller ID authentication solution exists for non-IP networks.[33] The Commission explained that it will consider a non-IP caller ID authentication framework to be "effective" if it determines that it is (1) fully developed and finalized by industry standards, and (2) reasonably available such that the underlying equipment and software necessary to implement such a protocol is available on the commercial market.[34] The Commission found that "significant industry consensus is an important predicate to deeming a non-IP solution 'effective.'"[35] Because the Commission found no effective solution for non-IP networks existed, it directed voice service providers to comply with the TRACED Act's non-IP mandate by working to develop such a solution.[36]

Second, the Commission established a process, consistent with the direction of section 4(b)(2) of the TRACED Act, to exempt voice service providers from the caller ID authentication implementation mandates if the Commission determines, by December 30, 2020, that such providers meet certain early implementation benchmarks.[37] The Commission interpreted the TRACED Act to create two exemptions—one for a voice service provider's IP networks, and another for a voice service provider's non-IP networks—and established criteria for each. To receive the IP exemption, a voice service provider must (i) have undertaken the network preparations necessary to deploy the STIR/SHAKEN protocols on its network; (ii) have completed formal registration (including payment) and testing with the Policy Administrator; (iii) have completed the necessary network upgrades to at least one network element to enable the authentication and verification of caller ID information consistent with the STIR/SHAKEN standards; and (iv) reasonably foresee that it will have completed all necessary network upgrades to its network infrastructure to be able to authenticate and verify caller ID information for all SIP calls exchanged with STIR/SHAKEN-enabled partners by June 30, 2021.[38] To receive the non-IP exemption, a voice service provider must (i) have been working to develop a non-IP authentication solution; and (ii) reasonably foresee that it will have completed all necessary network upgrades to its infrastructure to be

[30] TRACED Act § 4(b)(1).

[31] *First Report and Order and Further Notice*, 35 FCC Rcd at 3246, para. 9.

[32] *Second Report and Order*.

[33] *See id.* at 36, para. 68 n.269.

[34] *Id.* at 16, para. 32.

[35] *Id.* at 16, para. 31.

[36] *Id.* at 12-13, para. 24 (requiring voice service providers either to (1) completely upgrade its non-IP networks to IP and implement STIR/SHAKEN on its entire network, or (2) work to develop a non-IP authentication solution).

[37] TRACED Act § 4(b)(2).

[38] *See Second Report and Order* at 54-57, paras. 106-113.

able to authenticate and verify caller ID information for all non-IP calls originating or terminating on its network as provided by a standardized caller ID authentication framework for non-IP networks.[39]

To receive either or both of the exemptions, a voice service provider was required to submit a certification by December 1, 2020, explaining, in detail, how the company has accomplished or is working to accomplish the prongs of the desired exemption.[40] On December 23, 2020, pursuant to its delegated authority, the Bureau issued a list of parties that filed complete compliance certifications and which will thus receive an exemption.[41] Because the exemptions are, by their nature, based on a voice service provider's prediction of its future ability to implement caller ID authentication, those voice service providers that received an exemption will be required to file a second certification on a date after June 30, 2021 to be specified by the Bureau, stating whether they in fact achieved the implementation goal to which they previously committed.[42]

Report Public Notice. On October 1, 2020, to facilitate preparation of this Report, the Bureau released a Public Notice seeking comment on "the extent to which providers of voice service have implemented caller ID authentication frameworks in the IP and non-IP portions of their networks and on the efficacy of those frameworks in addressing all aspects of caller ID authentication."[43] We received comments from stakeholders representing voice service providers of various sizes and business models, as well as from ATIS.

III. REPORT

A. Exemption Determinations

The Bureau received exemption certifications from eight voice service providers. After reviewing those certifications, the Bureau released a Public Notice granting exemptions to seven of those voice service providers on the basis that each certified to meeting the implementation benchmarks. The Bureau granted exemptions to the following voice service providers: AT&T Services, Inc. (AT&T),[44] Bandwidth Inc. (Bandwidth), Charter Communications, Inc. (Charter), Comcast Cable Communications, LLC (Comcast), Cox Communications, Inc. (Cox), Cellco Partnership, d/b/a Verizon Wireless (Verizon Wireless), and Vonage Holding Corp (Vonage).[45] These voice service providers will need to make a subsequent filing no later than June 30, 2021, demonstrating that they met the implementation deadline. The Bureau declined to grant one requested exemption. The Bureau found that Nsight[46] did not qualify for the non-IP exemption on the grounds that it failed to meet either prong of the exemption.[47] Because the Bureau did not grant an exemption to Nsight, it must meet the implementation deadline of June 30, 2021, or a later date should it qualify for an extension.

---

[39] *See id.* at 57-58, paras. 114-116.

[40] *See id.* at 58-59, para. 118.

[41] *Exemption Determinations Public Notice*.

[42] *Second Report and Order* at 60, para. 121.

[43] *See Wireline Competition Bureau Invites Comment on Caller ID Authentication Progress for Report to Congress*, WC Docket No. 20-323, Public Notice, 35 FCC Rcd 10673 (WCB Oct. 1, 2020).

[44] Only AT&T's wireline network qualified for the exemption. See *Exemption Determinations Public Notice* at 2 n.10.

[45] *Exemption Determinations Public Notice* at 1.

[46] Nsight filed one certification on behalf of the following voice service providers: Bayland Telephone, LLC, Borderland Communications, LLC, Brown County C-LEC, LLC, Lakefield Telephone Company, LLC, Net Lec, LLC, Niagara Telephone Company, LLC, Northeast Telephone Company, LLC, and Nsighttel Wireless, LLC. *See* Nsight Certification and Supporting Statements for Exemption from Caller ID Authentication Requirements, WC Docket No. 20-68 (filed Dec. 1, 2020).

[47] *Exemption Determinations Public Notice* at 3.

B. Caller ID Authentication Implementation Progress

1. Implementation of STIR/SHAKEN in IP Networks

This section reports on the status of STIR/SHAKEN implementation among voice service providers based on information filed in the record, press releases, and exemption certifications. When reporting on the status of STIR/SHAKEN implementation among voice service providers, the Commission has previously divided voice service providers into three categories: (1) voice service providers that have implemented STIR/SHAKEN and began exchanging signed traffic with other voice service providers; (2) voice service providers that implemented STIR/SHAKEN but had not yet begun exchanging signed traffic with other voice service providers; and (3) voice service providers that had achieved limited, if any, progress towards upgrading their networks to support STIR/SHAKEN.[48] This Report likewise adopts those three categories to organize voice service providers by level of progress.

Voice Service Providers That Have Implemented STIR/SHAKEN and Are Exchanging Signed Traffic. At the time of this Report, the STIR/SHAKEN Policy Administrator lists 72 voice service providers that are authorized to participate in STIR/SHAKEN through the governance system.[49] This demonstrates progress by these providers toward the exchange of STIR/SHAKEN information with STIR/SHAKEN-enabled partners. A number of providers have also submitted filings stating that they had upgraded their networks to support STIR/SHAKEN, and are exchanging signed traffic: AT&T, Bandwidth, Charter, Comcast, Cox, Lumen (formerly CenturyLink), T-Mobile, Verizon, and Vonage.[50] Additionally, T-Mobile reports that UScellular is exchanging signed traffic.[51] AT&T stated that it "signs all [VoLTE and consumer VoIP] calls originating on its network and, when signed caller ID authentication is received from another provider, AT&T verifies all such calls at termination,"[52] and is

[48] *See, e.g.*, *FCC Call Blocking Report* at 31-33; *First Report and Order and Further Notice*, 35 FCC Rcd at 3249-51, paras. 18-21.

[49] *See* iconectiv, *Authorized Service Providers*, https://authenticate.iconectiv.com/authorized-service-providers-authenticate (last visited Dec. 22, 2020) (listing approved voice service providers).

[50] *See* Letter from Linda S. Vandeloop, Assistant Vice President, Regulatory Affairs, AT&T Services, Inc., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97, at 1 (filed Feb. 5, 2020) (AT&T *Ex Parte*); Letter from Greg Rogers, Head of Global Policy and Regulatory Affairs, Bandwidth, to Marlene H. Dortch, Secretary, FCC, CG Docket No. 17-59, WC Docket No. 17-97, at 1 (filed Jan. 31, 2020) (Bandwidth *Ex Parte*); Letter from Audrey Connors, Senior Director, Government Affairs, Charter Communications, to Hon. Ajit V. Pai, Chairman, FCC, WC Docket No. 17-97, at 1 (filed Dec. 13, 2019) (Charter *Ex Parte*); Letter from Beth Choroser, Vice President, Regulatory Affairs, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97, CG Docket No. 17-59, at 2 (filed Jan. 31, 2020) (Comcast *Ex Parte*); Letter from Jenny Prime, Senior Director, Regulatory Affairs, Cox Enterprises, Inc., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97, at 1 (filed Jan. 27, 2020) (Cox *Ex Parte*); Lumen Comments at 2; Letter from Cathleen A. Massey, Vice President, Federal Regulatory Affairs, T-Mobile, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97, at 1 (filed Jan. 30, 2020) (T-Mobile *Ex Parte*); Letter from Joe Russo, Senior Vice President, Network Operations, Verizon, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97, at 1 (filed Feb. 7, 2020) (Verizon *Ex Parte*).

[51] Press Release, T-Mobile, T-Mobile and UScellular Team up to Further Protect Customers from Scams and Spam (Nov. 19, 2020), https://www.businesswire.com/news/home/20201119006099/en/CORRECTING-and-REPLACING-T-Mobile-and-UScellular-Team-Up-to-Further-Protect-Customers-from-Scams-and-Spam. UScellular subsequently filed a request for an extension of the implementation deadline because "significant interconnection work with other carriers remains to be completed." *See* Motion of U.S. Cellular for Extension of Time, WC Docket No. 17-97, at 2-3 (filed Nov. 20, 2020), https://ecfsapi.fcc.gov/file/11202118425797/US%20Cellular%20FCC%20Motion%20for%20Extension%20of%20Time%20Dkt%20No.%2017-97%20as%20filed%2011-20-2020.pdf. The Bureau is considering this and other extension requests and must make a determination by March 30, 2021. *See Second Report and Order* at 34, para. 65.

[52] AT&T Comments at 2; Certification of AT&T Services, Inc. for Exemption from Caller ID Authentication Requirements on IP Networks, WC Docket No. 20-68, at 5 (filed Dec. 1, 2020),

(continued….)

working to extend those capabilities to its business VoIP platform.[53] Bandwidth announced the exchange of authenticated traffic with both Comcast and T-Mobile,[54] and submitted an exemption certification stating that it is also currently upgrading its network as an intermediate provider to support STIR/SHAKEN.[55] Charter submitted an exemption certification stating that it had completed implementation of STIR/SHAKEN in December 2019, is exchanging authenticated traffic with Comcast and Altice, and is finalizing a peering arrangement with T-Mobile.[56] Comcast noted progress since 2019 in the number of partners with which it exchanges authenticated traffic, and also reported that it "had expanded deployment of STIR/SHAKEN beyond its residential voice customers to include its small- and medium-sized business voice customers."[57] Cox submitted an exemption certification stating that, currently, "all outbound residential calls are authenticated, and all inbound calls are verified, with approximately 32% of residential inbound calls being authenticated by the originating carrier."[58] Cox added that, "[f]or business customers the IP network transition is greater than 91% complete and the production implementation of STIR/SHAKEN is a few months from occurring."[59]

Lumen reported that it "is now signing all IP-originated calls originating from its internal communications network and is transiting signed call[s] to providers that are capable of receiving

---

https://ecfsapi.fcc.gov/file/1201718409757/12.1.2020%20AT%26T%20Voluntary%20Implementation%20Exemption.pdf (AT&T Exemption Certification).

[53] AT&T Comments at 2. AT&T subsequently filed a request for a one-year extension of the implementation deadline because it needs more time to "upgrad[e its] network capabilities and capacity to support STIR/SHAKEN on [legacy portions of its IP and VoLTE networks], as well as to establish, and migrate traffic to, new traffic routes that are STIR/SHAKEN-enabled." Petition of AT&T for Extension of Implementation Deadline, WC Docket No. 17-97, at 2 (filed Nov. 20, 2020), https://ecfsapi.fcc.gov/file/112141280138/11.20.2020%20Extension%20Request%20FINAL.pdf.

[54] *See* Press Release, Bandwidth, Bandwidth Announces Successful STIR/SHAKEN Interop with T-Mobile (Mar. 25, 2020), https://www.prnewswire.com/news-releases/bandwidth-announces-successful-stirshaken-interop-with-t-mobile-301029410.html; Press Release, Bandwidth, Bandwidth Partners with Comcast to Reduce Robocalling with STIR/SHAKEN Call Protocols (Aug. 4, 2020), https://www.prnewswire.com/news-releases/bandwidth-partners-with-comcast-to-reduce-robocalling-with-stirshaken-call-protocols-301105771 html; Press Release, Bandwidth, Bandwidth Finalizes STIR/SHAKEN Interoperability with T-Mobile for Legacy Customers (Sept. 18, 2020), https://finance.yahoo.com/news/bandwidth-finalizes-stir-shaken-interoperability-125300431 html.

[55] Certification of Bandwidth Inc. for Exemption from Caller ID Authentication Requirements on IP Networks, WC Docket Nos. 17-97 and 20-68, at 5 (filed Dec. 1, 2020), https://ecfsapi.fcc.gov/file/12012226424304/Bandwidth%20Exemption%20Certification%20of%20Scott%20Mullen.pdf (Bandwidth Exemption Certification).

[56] Certification of Charter Commc'ns for Exemption from Caller ID Authentication Requirements on IP Networks, WC Docket No. 20-68, at 2 (filed Dec. 1, 2020), https://ecfsapi.fcc.gov/file/1201633424884/Charter%20STIR_SHAKEN%20Exemption%20Certification%2012-1-20.pdf (Charter Exemption Certification).

[57] Comcast Comments at 2; *see also* Certification of Comcast Cable Commc'ns, LLC for Exemption from Caller ID Authentication Requirements on IP Networks, WC Docket No. 20-68, at 2-3 (filed Dec. 1, 2020), https://ecfsapi.fcc.gov/file/12010797927937/Comcast%20-%20STIR-SHAKEN%20Compliance%20Certification%20(2020.12.01).pdf (Comcast Exemption Certification). However, as of September 2020, only approximately 18 percent of all calls originating on other voice service providers' networks and bound for Comcast's residential subscribers had a STIR/SHAKEN-compliant header and were verified by Comcast. Comcast Comments at 2-3.

[58] Certification of Cox Commc'ns, Inc. for Exemption from Caller ID Authentication Requirements on IP Networks, WC Docket No. 20-68, at 3 (filed Nov. 30, 2020), https://ecfsapi.fcc.gov/file/1130081908555/Exemption%20Certification%2011.30.20.docx (Cox Exemption Certification).

[59] *Id.*

them."[60] Lumen further added that it is "currently conducting active testing with three (3) providers and has completed testing with three (3) additional providers."[61] T-Mobile announced that it began exchanging authenticated traffic with Sprint and UScellular.[62] Verizon reported in its exemption certification that its "interconnection points with four service providers are now upgraded to pass the STIR/SHAKEN headers," and that "[w]ork is ongoing with several more service providers."[63] Verizon also reported in its comments that it has "begun signing for some enterprise customers."[64] However, Verizon also revealed that it continues to face delays with respect to its Fios Digital Voice service, and expects to complete deployment on its wireline network in the first half of 2021.[65] Vonage submitted an exemption certification stating that its network "is already upgraded and able to authenticate and verify caller ID information for all SIP calls exchanged with STIR/SHAKEN-enabled partners, subject to continued testing to ensure full functionality and reliability."[66] Additionally, Vonage stated that it has successfully tested STIR/SHAKEN caller ID authentication with its two largest peering partners.[67]

Voice Service Providers That Have Implemented STIR/SHAKEN But Have Not Announced that They Have Begun Exchanging Signed Traffic. At the time of this Report, a variety of voice service providers have announced that they have completed implementation of STIR/SHAKEN but have not publicly indicated that they had begun exchanging authenticated traffic. Brightlink, a provider of multi-cloud management software offering voice and messaging communication applications and analytics, announced in February that it "now has STIR/SHAKEN authentication across its entire network."[68] According to a July 2020 announcement, Buckeye Broadband, a cable and telecommunications provider serving customers in Ohio and Michigan, had deployed TNS Call Guardian, a call analytics solution that

---

[60] Lumen Comments at 2.

[61] *Id.* Lumen also subsequently filed a request for a six-month extension of the implementation deadline "to accommodate the potential for specific equipment-related delays." Request of Lumen for Extension, WC Docket No. 17-97, at 1 (filed Nov. 20, 2020), https://ecfsapi.fcc.gov/file/112012406154/201120%20Lumen%20extension%20request%20WC17-97.pdf (*Lumen Request for Extension*).

[62] *See* Press Release, T-Mobile, Cross-Network STIR/SHAKEN Rollout Helps Stop Number-Spoofing, Keeping Consumers Safer from Scammers (Feb. 4, 2020), https://www.t-mobile.com/news/tmobile-sprint-callerverified; Press Release, T-Mobile, T-Mobile and UScellular Team up to Further Protect Customers from Scams and Spam (Nov. 19, 2020), https://www.businesswire.com/news/home/20201119006099/en/CORRECTING-and-REPLACING-T-Mobile-and-UScellular-Team-Up-to-Further-Protect-Customers-from-Scams-and-Spam.

[63] Certification of Cellco Partnership, d/b/a Verizon Wireless, for Exemption from Caller ID Authentication Requirements on IP Networks, WC Docket No. 20-68, at 3 (filed Dec. 1, 2020), https://ecfsapi.fcc.gov/file/120141599338/12012020%20Verizon%20Certification.pdf (Verizon Exemption Certification).

[64] Verizon Comments at 2.

[65] *Id.* at 3. Verizon also subsequently filed a request for a three-year extension of the implementation deadline regarding a "specific and limited" portion of its network because it needs more time to "implement[] STIR/SHAKEN on its FTTP-SIP platform." Petition of Verizon for Declaratory Ruling or, in the Alternative, a Limited Extension of the STIR/SHAKEN Implementation Deadline, WC Docket No. 17-97, at 2-3 (filed Nov. 20, 2020), https://ecfsapi.fcc.gov/file/11201014508317/2020%2011%2020%20Verizon%20Petition.pdf.

[66] Certification of Vonage Holdings Corp. for Exemption from Caller ID Authentication Requirements on IP Networks, WC Docket No. 20-68, at 2 (filed Dec. 1, 2020), https://ecfsapi.fcc.gov/file/1201229815992/Vonage%20Voluntary%20Implementation%20Exemption%20-%20FINAL-SIGNED.pdf (Vonage Exemption Certification).

[67] *Id.*

[68] Press Release, Brightlink, Brightlink Takes on Robocalling with STIR/SHAKEN Solution (Feb. 26, 2020), https://finance.yahoo.com/news/brightlink-takes-robocalling-stir-shaken-150000143 html.

includes STIR/SHAKEN caller ID authentication.[69] Frontier reported in February that it "established the capability to authenticate and sign calls" and is in the negotiating and testing phase regarding authenticating traffic exchanged with other voice service providers.[70] According to a September announcement, Google's Verified Calls service now integrates Neustar's Trusted Call Solutions platform, providing digital signatures to calls through STIR/SHAKEN caller ID authentication.[71] According to a November 2019 announcement, Inteliquent, along with T-Mobile and Comcast, completed end-to-end STIR/SHAKEN call verification across the three networks.[72] Peerless Network, a provider of telecommunications services for enterprise and wholesale customers, announced in October 2019 that it had upgraded its network to be STIR/SHAKEN compliant.[73] Twilio, a cloud communications platform that enables phones, VoIP, and messaging to be embedded into web, desktop, and mobile software,[74] announced in April that it had begun signing enterprise calls using STIR/SHAKEN protocols.[75] Quality Voice & Data, a cloud-based telecom switching and VoIP services provider announced in May that it now meets requirements necessary to provide STIR/SHAKEN call attestation for its customers.[76] According to a May 2020 announcement, Viaero Wireless, a US-based mobile network regional operator, will deploy TNS Call Guardian.[77] And Ytel, a software company which provides a communication platform allowing developers and businesses to build SMS and voice capabilities into various applications, announced in February that it "successfully completed one of the first STIR/SHAKEN signed and verified calls from [its] network."[78]

Voice Service Providers That Have Not Yet Announced They Have Implemented STIR/SHAKEN. TDS reported in January that it had completed work to evaluate, select, and lab-test a vendor solution to allow it to integrate STIR/SHAKEN in the IP portions of its network.[79] It explained at the time that it was

---

[69] *See* Press Release, Transaction Network Services, Buckeye Broadband Taps TNS Call Guardian in Battle Against Robocalls (July 30, 2020), https://www.businesswire.com/news/home/20200730005120/en/Buckeye-Broadband-Taps-TNS-Call-Guardian-In-Battle-Against-Robocalls.

[70] Letter from Diana Eisner, Director, Federal Regulatory, Frontier Commc'ns, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97 at 1 (filed Feb. 21, 2020).

[71] Press Release, Neustar, Neustar Integrates with Google Verified Calls to Help Restore Trust in the Phone Channel (Sept. 8, 2020), https://www.businesswire.com/news/home/20200908005802/en/Neustar-Integrates-with-Google-Verified-Calls-to-Help-Restore-Trust-in-the-Phone-Channel.

[72] *See* Press Release, T-Mobile, T-Mobile, Comcast and Inteliquent Deliver Industry First in War Against Illegal Call Spoofing (Nov. 21, 2019), https://www.t-mobile.com/news/tmobile-comcast-inteliqent.

[73] *See* Press Release, Peerless Network, Peerless Network Delivers, Exceeds SHAKEN/STIR Requirements (Oct. 9, 2019), https://www.peerlessnetwork.com/peerless-network-delivers-exceeds-shaken-stir-requirements.

[74] *See* Twilio, *About*, https://www.twilio.com/company (last visited May 4, 2020).

[75] *See* Press Release, Twilio, Twilio Begins Signing Enterprise Calls Using SHAKEN/STIR Protocols to Help Stop Illegal Robocalls for Business Users (April 8, 2020), https://finance.yahoo.com/news/twilio-begins-signing-enterprise-calls-130000912 html.

[76] *See* Press Release, Quality Voice & Data, Quality Voice & Data Attains Authorized SHAKEN Service Provider Status (May 26, 2020), https://www.prnewswire.com/news-releases/quality-voice--data-attains-authorized-shaken-service-provider-status-301064069.html.

[77] *See* Press Release, Transaction Network Services, Viaero Wireless Selects TNS Call Guardian for Robocall Protection (May 12, 2020), https://www.businesswire.com/news/home/20200512005078/en/Viaero-Wireless-Selects-TNS-Call-Guardian-for-Robocall-Protection.

[78] Press Release, Ytel, Ytel Completes One of the First STIR/SHAKEN Calls from CPaaS Platform (Feb. 27, 2020), https://www.prweb.com/releases/ytel_completes_one_of_the_first_stir_shaken_calls_from_cpaas_platform/prweb16942695.htm.

[79] *See* Letter from Sara Cole, Regulatory Counsel, TDS Telecommc'ns, LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97 at 1 (rec. Jan. 30, 2020) (TDS *Ex Parte*).

in the process of developing implementation plans, but because many of its interconnection points with other voice service providers are not IP-enabled, it "forecast[ed] that only a small percentage of traffic will be exchanged in IP when SHAKEN/STIR is initially deployed in the TDS IP network."[80] RedShift Networks, a provider of cybersecurity solutions for enterprises, global carriers, and cloud communications operators, announced that it had completed interoperability testing of STIR/SHAKEN with the ATIS Robocalling Testbed.[81] USA Digital Communications, Inc., a provider of commercial enterprise data and voice solutions, announced that it had received authorization by the Policy Administrator to receive STIR/SHAKEN certificates.[82] A few other entities also announced progress toward implementation of STIR/SHAKEN.[83]

Additional Update of Note. On November 23, 2020, Comcast, Everbridge, NetNumber, Numeracle, and Twilio announced that they completed the first-ever telephone call that combines authenticated caller ID with "Rich Call Data."[84] Both ATIS and the Internet Engineering Task Force are finalizing work on draft standards for Rich Call Data,[85] which "allows legitimate callers to tell recipients exactly who they are, where they're calling from, and even why they are calling, with the highest degree of trust and certainty."[86] With Rich Call Data, voice service providers can "display . . . the Verified Identity of the . . . caller via Caller ID Name, brand logo, and call reason" to the end consumer, giving the consumer more information to consider in deciding whether to accept the call.[87]

2. Implementation of Caller ID Authentication in Non-IP Networks

The TRACED Act also requires us to report on the extent to which voice service providers have implemented an effective caller ID authentication framework in their non-IP networks.[88] As noted earlier, in the *Second Report and Order* the Commission found that no caller ID authentication framework is

---

[80] *Id.*

[81] Press Release, Redshift Networks, Redshift Networks Completes Successful Interoperability Testing of STIR/SHAKEN Anti-Robocall Solution with the ATIS Robocalling Testbed (Nov. 19, 2020), https://www.prweb.com/releases/redshift_networks_completes_successful_interoperability_testing_of_stir_shaken_anti_robocall_solution_with_the_atis_robocalling_testbed/prweb17555330.htm.

[82] *See* Press Release, USA Digital Comm'cns, Inc., USA Digital Receives Policy Administrator Authorization (June 30, 2020), https://www.prnewswire.com/news-releases/usa-digital-receives-policy-administrator-authorization-301086110.html.

[83] *See, e.g.*, Dave Warner, *Little Falls Company Joins Exclusive Club*, My Little Falls (Nov. 19, 2020), https://mylittlefalls.com/little-falls-company-joins-exclusive-club; Press Release, Sangoma Tech. Corp., Sangoma Announces Asterisk 18, Kicking Off AstriCon, the Annual Asterisk User Group Conference (Oct. 20, 2020), https://www.prnewswire.com/news-releases/sangoma-announces-asterisk-18-kicking-off-astricon-the-annual-asterisk-user-group-conference-301156018 html.

[84] Press Release, Comcast et al., Technology Companies Complete First-Ever Telephone Call with Authenticated Caller ID and Rich Call Data, Powered by STIR/SHAKEN (Nov. 23, 2020), https://www.businesswire.com/news/home/20201123005376/en/Technology-Companies-Complete-First-Ever-Telephone-Call-with-Authenticated-Caller-ID-and-Rich-Call-Data-Powered-by-STIRSHAKEN.

[85] ATIS, Signature-based Handling of Asserted Information Using toKENs (SHAKEN: Calling Name and Rich Call Data Handling Procedures, ATIS-1000XXX, https://access.atis.org/apps/group_public/download.php/45828/IPNNI-2019-00024R000.docx; Internet Eng'g Task Force, PASSporT Extension for Rich Call Data (Nov. 16, 2020), https://datatracker.ietf.org/doc/draft-ietf-stir-passport-rcd/?include_text=1.

[86] Press Release, Comcast et al., Technology Companies Complete First-Ever Telephone Call with Authenticated Caller ID and Rich Call Data, Powered by STIR/SHAKEN (Nov. 23, 2020), https://www.businesswire.com/news/home/20201123005376/en/Technology-Companies-Complete-First-Ever-Telephone-Call-with-Authenticated-Caller-ID-and-Rich-Call-Data-Powered-by-STIRSHAKEN.

[87] *Id.*

[88] TRACED Act § 4(b)(3).

"effective" because there is not yet a standardized solution.[89] Industry continues to work on developing a solution. ATIS explains that it formed the Non-IP Call Authentication Task Force on June 1, 2020 to investigate the issue of caller ID authentication over non-IP networks.[90] It reported that the task force "has received a significant number of contributions from members proposing mechanisms that could support non-IP call authentication."[91] These contributions fall into two broad categories: a solution that operates out-of-band, and a solution that works in-band on TDM technology.[92] One commenter expressed support for out-of-band STIR as a promising solution that is still in development.[93] Another commenter reported that "several voice service providers [are] using Out-of-Band SHAKEN in their production networks today[,] including Brightlink, New Lisbon Telephone Company, and Wabash Communications."[94] At least one stakeholder argues that until the Commission determines that an effective non-IP solution exists, call analytics can be a substitute for caller ID authentication over time-division-multiplexed networks.[95]

C. Impact of Equipment Availability

The TRACED Act requires that the Commission report on "whether the availability of necessary equipment and equipment upgrades has impacted" the implementation of STIR/SHAKEN and an effective non-IP caller ID authentication framework.[96] In response to the Public Notice seeking comment on this topic, no commenter filed comments stating that it has experienced equipment availability issues, nor did any commenter suggest that equipment availability would have or has had an impact on implementing a non-IP caller ID authentication solution. Regarding STIR/SHAKEN, Lumen, noted that "it is possible that issues may arise related to equipment availability—software updates, in particular—that could delay Lumen's implementation timeline."[97] Lumen added that, because "software releases and associated testing is a complex and iterative process with interdependencies that cannot always be anticipated in advance[, t]hese interdependencies have the potential to impact Lumen's deployment timeline particularly if additional hardware or software ends up being required."[98] USTelecom stated its belief that equipment availability is an issue that "will be responsible for slowing STIR/SHAKEN deployment progress" by small voice service providers.[99]

---

[89] *See Second Report and Order* at 36, para. 68 n.269; *see also id.* at 15-16, para. 31.

[90] Letter from Thomas Goode, General Counsel, ATIS, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 20-323, at 2 (Oct. 27, 2020) (ATIS *Ex Parte*).

[91] *Id.*

[92] *Id.*

[93] *See* NTCA Comments at 9; *see also* Transaction Network Services, Inc. Comments, CG Docket No. 17-59, WC Docket No. 17-97, at 15-16 (rec. July 24, 2019) (TNS July 24, 2019 Comments).

[94] Letter from Jim Dalton, CEO, TransNexus, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 17-97 and 20-67, at 1-2 (July 23, 2020).

[95] Lumen Comments at 5 ("Call analytics programs can provide another layer of protection against illegal robocalls that is particularly applicable for TDM networks. These steps should be considered a reasonable proxy for call authentication as development work for solutions on non-IP networks continues.").

[96] TRACED Act § 4(b)(3)(A).

[97] Lumen Comments at 3.

[98] *Id.* Lumen subsequently filed a request for a six-month extension of the implementation deadline on the basis that such an extension would allow it to "accommodate any . . . specific equipment-related potential delays to the extent needed to implement STIR/SHAKEN." *Lumen Request for Extension* at 7. The Bureau is considering this request and must make a determination by March 30, 2021. *See Second Report and Order* at 34, para. 65.

[99] USTelecom Reply at 3.

In March of 2020, the Commission sought comment in the *Further Notice* about the burdens and barriers to implementation presented by equipment availability and cost.[100] In response, the Commission received comments that claimed that equipment availability issues specifically impact small voice service providers.[101] Commenters claimed that such voice service providers often rely on third-party vendor solutions—particularly software solutions—to implement STIR/SHAKEN, and these solutions may be prohibitively expensive for some small voice service providers.[102] While commenters pointed to high upfront costs with limited transparency, they also claimed that as medium and large voice service providers start to deploy STIR/SHAKEN widely, new and improved solutions may emerge, increasing competition among vendors and decreasing costs.[103]

Based on the record developed in response to the March *Further Notice*, the Commission concluded in its *Second Report and Order* that it was unnecessary to grant an extension solely on the basis of an inability to purchase or upgrade equipment to support caller ID authentication, or lack of availability of such equipment.[104] It found that its extension for small voice service providers "adequately addresses challenges with regard to obtaining necessary equipment."[105] In fact, the Commission granted the small voice service provider extension "to allow small voice service providers sufficient time to address challenges such as equipment cost and availability."[106] It reasoned that additional time will allow voice service providers confronted with budget shortages to spread costs over a longer time horizon.[107] Further, the Commission concluded that an extension will allow vendors that work with small voice service providers more time to develop solutions and offer those solutions at a lower cost as the market matures.[108]

We thus conclude, in light of the record developed both for the *Second Report and Order* and this Report, that it is reasonably possible that equipment availability may pose hurdles to the deployment of STIR/SHAKEN. We expect that any such hurdles would particularly affect small voice service providers. At the time of this Report, we have not received any reports of equipment availability issues actually impacting voice service providers, but we will continue to monitor this issue.

D. Efficacy of Caller ID Authentication Frameworks

The TRACED Act requires that the Commission provide "an assessment of the efficacy of" STIR/SHAKEN and any effective non-IP caller ID authentication framework that the Commission requires voice service providers to implement by the June 30, 2021 deadline, in "addressing all aspects of call authentication."[109] Absent widespread implementation of either STIR/SHAKEN or a non-IP caller ID authentication framework, such an assessment is difficult, if not impossible.[110] Because of the

---

[100] *See First Report and Order and Further Notice*, 35 FCC Rcd at 3275, para. 73.

[101] *Second Report and Order* at 19, para. 42.

[102] *Id.*

[103] *Id.* at 20, para. 42.

[104] *Id.* at 28-29, para. 57.

[105] *Id.*

[106] *Id.* at 20, para. 43.

[107] *Id.* at 21, para. 43.

[108] *Id.*

[109] TRACED Act § 4(b)(3)(B).

[110] *See, e.g.*, AT&T Comments at 5-6 ("The ongoing implementation and development of STIR/SHAKEN thus present an obstacle to any evaluation of the present efficacy of STIR/SHAKEN. Drawing conclusions about STIR/SHAKEN's efficacy at this juncture necessarily would rely on assumptions rather than actual experience with the protocols' operation across the voice ecosystem. . . . AT&T urges that any definitive judgment rendered with (continued….)

STIR/SHAKEN framework's design, the greater the number of voice service providers that implement it, the more effective it will be in combating illegal robocalls, and the more the expected benefits will be realized.[111] The record supports the conclusion that it is premature to evaluate the efficacy of STIR/SHAKEN at this time.[112] We agree with AT&T's assertion that "[t]he ongoing implementation and development of STIR/SHAKEN . . . present an obstacle to any evaluation of the present efficacy of STIR/SHAKEN. Drawing conclusions about STIR/SHAKEN's efficacy at this juncture necessarily would rely on assumptions rather than actual experience with the protocols' operation across the voice ecosystem."[113]

While it may be premature to assess the efficacy of STIR/SHAKEN in practice, we can report on the efficiency of its design and progress made toward resolving certain specific identified issues in the record that may impact its efficacy. There is broad industry consensus that STIR/SHAKEN is well-designed,[114] and the record has produced no compelling reason to come to a different conclusion. Evidence also suggests that STIR/SHAKEN, where implemented, is working as intended and is a useful tool in reducing instances of illegal robocalls, informing labeling, and conducting tracebacks.[115]

Commenters also agree that STIR/SHAKEN paired with other tools, such as call analytics, may increase its efficacy.[116] As the Commission noted in its *First Report and Order and Further Notice*, pairing caller ID authentication with call analytics may be a powerful and effective tool to protect American consumers from fraudulent robocall schemes.[117] Recognizing the benefits of both technologies

---

respect to the efficacy of STIR/SHAKEN should be based on the results of the protocols in operation on a broad scale. AT&T thus believes for these and other reasons that it is premature to make any concrete findings regarding the efficacy of STIR/SHAKEN.").

[111] *Second Report and Order* at 14, para. 27; *see also, e.g.*, AT&T Comments, CG Docket No. 17-59, WC Docket No. 17-97, at 4 n.8 (rec. Aug. 23, 2019); T-Mobile Comments, WC Docket Nos. 17-97 and 20-67, at 4 (rec. May 15, 2020); TNS July 24, 2019 Comments at 15 ("Indeed, the full benefits of SHAKEN/STIR cannot be achieved until it is nearly ubiquitously deployed.").

[112] *See, e.g.*, AT&T Comments at 5-6; USTelecom Reply at 3-4 (arguing that "[t]he work is ongoing" to deploy STIR/SHAKEN, and that "it is premature to make any conclusions about the efficacy of any frameworks" in this Report); *see also, e.g.*, TNS July 24, 2019 Comments at 6.

[113] AT&T Comments at 5.

[114] *See, e.g.*, T-Mobile Comments, WC Docket Nos. 17-97 and 20-67, at 4 (rec. May 15, 2020); TNS July 24, 2019 Comments at 19 (supporting the Commission's efforts to promote STIR/SHAKEN); Inteliquent, Inc. Reply at 1 (STIR/SHAKEN "is poised to greatly reduce robocalls and other harmful and fraudulent calls throughout the country."); Call Authentication Trust Anchor Working Grp., North American Numbering Council, Report on Selection of Governance Authority and Timely Deployment of SHAKEN/STIR at 15 (2018), https://docs.fcc.gov/public/attachments/DOC-350542A1.pdf ("SHAKEN/STIR and specifically the SHAKEN SIP Framework are a key component of the overall system to both protect consumers against illegal robocalls by carrying the cryptographic signatures and providing secure information for reliably and efficiently tracing back identified illegal calls to the communications service providers that can identify the origin . . . ."); *id.* at 18 ("Implementation of the SHAKEN/STIR framework is an efficient and prudent way to ensure the security and protection of the telephone ecosystem.").

[115] *See, e.g.*, T-Mobile *Ex Parte* at 2 ("Using STIR/SHAKEN and its other scam-identifying tools, T-Mobile has identified over 21 billion scam calls and blocked over five billion calls to date."); Press Release, Verizon, Verizon Continues to Lead Industry in Fight Against Robocalls (Dec. 3, 2020), https://stockhouse.com/news/press-releases/2020/12/03/verizon-continues-to-lead-industry-in-fight-against-robocalls ("STIR/SHAKEN . . . helps us make better decisions about what calls should be avoided."); Press Release, AT&T, AT&T, Comcast Announce Anti-Robocalling Fraud Milestone Believed to Be Nation's First (Mar. 20, 2019).

[116] *See, e.g.*, TNS July 24, 2019 Comments at 7-8; Neustar, Inc. Reply, CG Docket No. 17-59, WC Docket No. 17-97, at 3 (rec. Aug. 23, 2019) ("[P]roviders will obtain better results if they include STIR/SHAKEN in the analytics that they deploy to combat illegal robocalls.").

[117] *First Report and Order and Further Notice*, 35 FCC Rcd at 3252, para. 25.

working in tandem, the Commission adopted a safe harbor enabling voice service providers to block unwanted calls by default if based on reasonable analytics that incorporate caller ID authentication information, so long as consumers are given the opportunity to opt out.[118] Lumen supports "additional measures to supplement STIR/SHAKEN given the complexity of the larger illegal robocall problem," noting that a "multi-faceted approach is likely to be more effective than STIR/SHAKEN alone."[119] Voice service providers are already incorporating STIR/SHAKEN authentication information into their call analytics engines to help make more informed call blocking decisions and better protect consumers from illegal calls.[120]

As for assessing the efficacy of a non-IP caller ID authentication framework, the Commission recently determined that no solution is "effective" because industry has not yet standardized such a framework.[121] As the Commission stated, we will continue to monitor industry progress toward a solution, and we look forward to progress as voice service providers fulfill their obligation to work to develop a non-IP caller ID authentication solution.[122]

Specific Issues Identified in the Record. Despite overwhelming evidence from across the industry that STIR/SHAKEN is efficiently designed and thus far working as intended, some commenters have identified specific issues that they believe could impact the efficacy of STIR/SHAKEN. Specifically, they identify issues regarding enterprise callers, the Governance Authority's policies, a lack of universal IP interconnection between voice service providers, and accessibility of voice service provider contact information. Industry is already making progress on many of these issues.

INCOMPAS raises the issue that certain complex enterprise use cases and business models could pose challenges in the STIR/SHAKEN framework, as it would be difficult for an outbound call to the highest level of attestation.[123] INCOMPAS champions "certificate delegation" as a solution to this issue, and requests that we encourage its development and adoption.[124] ATIS and the SIP Form recently approved a joint standard on certificate delegation, which gives guidance to voice service providers that wish to provide this service to their clients,[125] and stakeholders continue to explore alternative possible solutions for enterprise calling cases.[126] These developments demonstrate that industry is making progress to address INCOMPAS's concern.

INCOMPAS and Inteliquent argue that voice service providers without access to numbers are unable to participate in STIR/SHAKEN because of the Governance Authority's SPC token access

---

[118] *Advanced Methods to Target and Eliminate Unlawful Robocalls et al.*, CG Docket No. 17-59, Third Report and Order et al., 35 FCC Rcd 7614, 7625, para. 25 (2020).

[119] Lumen Comments at 3-4.

[120] *See, e.g.*, AT&T *Ex Parte* at 2; Charter Comments, CG Docket No. 17-59, WC Docket No. 17-97, at 3 (rec. Jan. 28, 2020); Verizon Comments, CG Docket No. 17-59, WC Docket No. 17-97, at 4 (rec. Jan. 29, 2020).

[121] *See Second Report and Order* at 36, para. 68 n.269.

[122] *See id.* at 13, para. 24.

[123] *See* INCOMPAS Comments at 3; *Second Report and Order* at 29-30, para. 58.

[124] INCOMPAS Comments at 3.

[125] ATIS Comments at 2; *see also* ATIS., Signature-based Handling of Asserted Information Using toKENs (SHAKEN): Delegate Certificates (June 30, 2020), https://access.atis.org/apps/group_public/download.php/56801/ATIS-1000092.zip (ATIS-1000092).

[126] *See* SIPNOC, STIR/SHAKEN Virtual Summit, Deployment of Enterprise Attestation Uplift with a TN Registry (June 24, 2020), https://www.sipforum.org/download/8-deployment-of-enterprise-attestation-uplift/?wpdmdl=3885&refresh=5fd1691a4675e1607559450.

policy.[127] The Governance Authority recently revised its policy, effective upon the Commission's Robocall Mitigation Certification filing deadline,[128] eliminating the requirement that a voice service provider have direct access to numbering resources to be cleared by the Policy Administrator for access to certificates.[129] Eliminating this requirement should significantly expand voice service providers' access to STIR/SHAKEN. We will continue to monitor this issue to ensure that it does not stand in the way of effective caller ID authentication.

NTCA argues that a lack of IP interconnection between some voice service providers is a barrier to effective caller ID authentication.[130] Because STIR/SHAKEN is an IP solution, if a call goes over a non-IP interconnection point the caller ID authentication information is lost—even if both the originating and terminating voice service providers have IP networks.[131] The Commission is aware of this issue,[132] and explained in the *Second Report and Order* that it is monitoring it closely.[133] Industry stakeholders are also continuing to discuss and evaluate how to resolve this issue.[134] Further, as the Commission has found, even in instances where a voice service provider is unable to interconnect in IP, STIR/SHAKEN offers benefits for intra-network traffic.[135]

Inteliquent asserts that voice service providers face challenges that hinder inter-network testing of STIR/SHAKEN with interconnecting partners for which they cannot obtain contact information.[136] As this is the first time that this issue has been brought to our attention, the Bureau will monitor the issue in case more voice service providers encounter similar difficulties, and will revisit the issue if it presents a serious roadblock to STIR/SHAKEN implementation. We encourage voice service providers that experience this or any other serious roadblock to implementation to call the issue to our attention. At the same time, because the TRACED Act and the Commission's rules thereunder require voice service providers to implement STIR/SHAKEN by June 30, we encourage voice service providers to take the steps necessary to work diligently toward implementation, such as sharing contact information with other voice service providers.

---

[127] *See* Inteliquent Reply at 2 ("Pursuant to policy decisions made by STI-GA to implement the authentication framework, without direct access to numbers, a voice provider cannot register as a Service Provider. And without such a registration, these voice providers are unable to sign calls. This lack of ability to sign calls creates two problems that inhibit the framework. . . . [T]his undermines the efficacy of the STIR/SHAKEN framework . . . .").

[128] The Commission directed the Bureau to issue a Public Notice announcing both when voice service providers may begin filing certifications in the Robocall Mitigation Database and establishing the deadline for filed certifications. *Second Caller ID Authentication Report and Order* at 44-45, para. 83. The Commission further directed the Bureau to set the filing deadline no earlier than June 30, 2021. *Id.*

[129] *See* Secure Telephone Identity Governance Auth., *STI-GA Policy Decisions Document* (Nov. 18, 2020), https://sti-ga.atis.org/wp-content/uploads/sites/14/2020/11/201118-STIGA-Board-Policy.pdf; *STIR/SHAKEN Caller ID Authentication Governance Framework Revised to Expand Participation*, WC Docket No. 17-97, Public Notice (WCB Nov. 18, 2020), https://docs.fcc.gov/public/attachments/DA-20-1374A1.pdf.

[130] *See* NTCA Comments at 3-4.

[131] *See Second Report and Order* at 32, para. 61 n.241.

[132] *See Parties Asked to Refresh the Record on Intercarrier Compensation Reform Related to the Network Edge, Tandem Switching and Transport, and Transit*, CC Docket No. 01-92, WC Docket No. 10-90, Public Notice, 32 FCC Rcd 6856 (WCB 2017) (*Network Edge Public Notice*).

[133] *Second Report and Order* at 33, para. 63 n.249; *see also Network Edge Public Notice*.

[134] *See* SIP Forum, *The Holy Grail: Achieving Ubiquitous IP Interconnection and the Battle over Inter-Carrier Compensation*, https://register.gotowebinar.com/register/3088351551805713677 (last visited Dec. 22, 2020) (video recording of panel of industry experts discussing the issue of achieving ubiquitous IP interconnection).

[135] *Second Report and Order* at 32-33, para. 63.

[136] *See* Inteliquent Reply at 2.

From:	Joy Medley
To:	"Kelsey_Guyselman@commerce.senate.gov"; "olivia_trusty@commerce.senate.gov"; "John_Lin@commerce.senate.gov"; "reed_cook@commerce.senate.gov"; "kevin_holmes@commerce.senate.gov"
Cc:	Paul Jackson; Lori Maarbjerg
Subject:	Caller ID Authentication Implementation Progress Report
Date:	Tuesday, December 29, 2020 12:23:23 PM
Attachments:	Wicker 12.29.20.pdf

Please see attached Report to Congress On Caller ID Authentication Implementation Progress. This report is submitted pursuant to Sections 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.
If you have any questions, please contact Lori Maarbjgerg at lori.maarbjerg@fcc.gov.

From: Joy Medley
To: "Christianna_Barnhart@schatz.senate.gov"; "eric_einhorn@schatz.senate.gov"
Cc: Paul Jackson; Lori Maarbjerg
Subject: Caller ID Authentication Implementation Progress Report
Date: Tuesday, December 29, 2020 12:23:12 PM
Attachments: Schatz 12.29.20.pdf

Please see attached Report to Congress On Caller ID Authentication Implementation Progress. This report is submitted pursuant to Sections 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.
If you have any questions, please contact Lori Maarbjgerg at lori.maarbjerg@fcc.gov.

From: Joy Medley
To: "Alex_Sachtjen@thune.senate.gov"; "lauren_greenwood@thune.senate.gov"
Cc: Paul Jackson; Lori Maarbjerg
Subject: Caller ID Authentication Implementation Progress Report
Date: Tuesday, December 29, 2020 12:22:40 PM
Attachments: Thune 12.29.20.pdf

Please see attached Report to Congress On Caller ID Authentication Implementation Progress. This report is submitted pursuant to Sections 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.
If you have any questions, please contact Lori Maarbjgerg at lori.maarbjerg@fcc.gov.

From: Joy Medley
To: "philip.murphy@mail.house.gov"
Cc: Paul Jackson; Lori Maarbjerg
Subject: Caller ID Authentication Implementation Progress Report
Date: Tuesday, December 29, 2020 12:22:28 PM
Attachments: Doyle 12.29.20.pdf

Please see attached Report to Congress On Caller ID Authentication Implementation Progress. This report is submitted pursuant to Sections 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.
If you have any questions, please contact Lori Maarbjgerg at lori.maarbjerg@fcc.gov.

From: Joy Medley
To: "rachel.rathore@mail.house.gov"
Cc: Paul Jackson; Lori Maarbjerg
Subject: Caller ID Authentication Implementation Progress Report
Date: Tuesday, December 29, 2020 12:22:26 PM
Attachments: Latta 12.29.20.pdf

Please see attached Report to Congress On Caller ID Authentication Implementation Progress. This report is submitted pursuant to Sections 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.
If you have any questions, please contact Lori Maarbjgerg at lori.maarbjerg@fcc.gov.

From:	Joy Medley
To:	"john_branscome@commerce.senate.gov"; "shawn_bone@commerce.senate.gov"; Betsy_McIntyre@commerce.senate.gov; "narda_jones@cantwell.senate.gov"; Brian_McDermott@commerce.senate.gov
Cc:	Paul Jackson; Lori Maarbjerg
Subject:	Caller ID Authentication Implementation Progress Report
Date:	Tuesday, December 29, 2020 12:22:19 PM
Attachments:	Cantwell 12.29.20.pdf

Please see attached Report to Congress On Caller ID Authentication Implementation Progress. This report is submitted pursuant to Sections 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.
If you have any questions, please contact Lori Maarbjgerg at lori.maarbjerg@fcc.gov.

TRACED Act Implementation
Report to Committee on Appropriations
March 2021

The FY21 Omnibus Appropriations Explanatory Statement requires the FCC to report to the Committee on the status of implementation of the TRACED Act (Pub. L. 116-105). The following information is responsive to that request.

BACKGROUND: As the Committee notes, robocalls continue to be a serious problem for consumers and are the top consumer complaint at the FCC. The TRACED Act provided the Commission with additional tools and requirements to continue to address the issue.

IMPLEMENTATION OF CALLER ID AUTHENTICATION FRAMEWORK. One of the main provisions of the TRACED Act requires the FCC to mandate the STIR/SHAKEN caller identification framework. STIR/SHAKEN enables phone companies to verify that the caller ID information transmitted with a call matches the caller's phone number.

- *Implementation of STIR/SHAKEN* (Sec. 4)*:*
    - The Commission adopted a Report and Order on March 31, 2020 mandating that originating and terminating voice service providers implement STIR/SHAKEN in the IP portions of their networks by June 30, 2021.
    - The Commission adopted the Second Report and Order on September 29, 2020 that provided new rules to further implement STIR/SHAKEN and protect consumers against malicious caller ID spoofing.
    - The Commission released a Public Notice on December 23, 2020 that announced exemptions granted to certain providers pursuant to Sec. 4 of the TRACED Act and the STIR/SHAKEN rules.
- *Burdens and Barriers to Implementation Assessment* (Sec. 4)*:*
    - The Commission sought comment as part of a Further Notice of Proposed Rulemaking adopted on March 31, 2020.
    - The Commission provided the required assessment in the Second Report and Order adopted on September 29, 2020.
- *Best Practices* (Sec. 4): The Commission released a Public Notice on December 22, 2020 regarding best practices for implementation of effective caller authentication framework.
- *Implementation Report to Congress* (Sec. 4)*:* The Commission submitted its required STIR/SHAKEN Implementation Report to Congress on December 29, 2020.

TRACED ACT CONSUMER-RELATED PROVISIONS

- *Safe Harbor* (Sec. 4)*:* Requires the Commission to establish rules and a safe harbor for call blocking based on the information provided by the caller identification framework.
    - The Commission sought comment as part of a Further Notice of Proposed Rulemaking adopted on July 16, 2020.

- The Commission adopted a 4th Report and Order on December 29, 2020 that expanded the safe harbor to include network-based blocking based on reasonable analytics that incorporate caller ID authentication information designed to identify calls that are highly likely to be illegal.

- *Consumer Protection Proceeding* (Sec. 7)*:* Requires the FCC to commence a proceeding to help protect a subscriber from receiving unwanted calls or text messages from a caller using an unauthenticated number.
  - The Commission sought comment as part of a Further Notice of Proposed Rulemaking adopted on July 16, 2020. In its 4th Report and Order adopted on December 29, 2020, the Commission declined to take further action under Sec. 7, stating that it may act in the future, as circumstances warrant, but that the best approach to protecting consumers from unwanted calls from unauthenticated numbers is through blocking programs that are consistent with the safe harbor the Commission previously adopted.

- *Consumer Protections for Exemptions* (Sec. 8)*:* Requires FCC to amend its rules pursuant to amendments made to Section 227(b)(2).
  - The Commission adopted a Notice of Proposed Rulemaking on October 1, 2020 that sought comment on whether to amend any of the previously established exemptions the Commission to comply with the TRACED Act.
  - The Commission adopted a Report and Order on December 29, 2020 that: (1) codifies the exemptions for calls to wireless numbers into the rules in order to make those exemptions more clear and understandable for both callers and consumers; (2) amends the exemptions for calls made to residential telephone lines to identify the classes of parties that may make such calls, the classes of parties that may be called, and the number of such calls that may be made; and (3) concludes that the conditions the Commission has already imposed on exemptions for calls made to wireless telephone numbers under section 227(b)(2)(C) are sufficient to satisfy the new provisions in the TRACED Act.

- *Reassigned Number Database Report* (Sec. 9)*:* The Commission submitted the required Report to Congress on December 4, 2020 and publicly released it on December 8, 2020.
  - The Report describes the Commission's efforts to establish the Database; technical and operational guidance; Database funding; and the requirements for aging of numbers, recordkeeping, and reporting permanent disconnection data to the Database.
  - The Commission awarded a contract to SomosGov, Inc. to develop the Database. Work began on December 1, 2020.

- *Call Blocking* (Sec. 10)*:* Requires the FCC to take action to ensure that both callers and consumers are provided with transparency and effective redress when wanted calls are blocked using call blocking programs provided on an opt-in or opt-out basis.

- The Commission sought comment on July 16, 2020 in a Further Notice of Proposed Rulemaking.
- The Commission adopted a 4th Report and Order on December 29, 2020 that requires: (1) terminating voice service providers that block calls to immediately notify the caller that the call has been blocked; (2) terminating voice service providers that block calls on an opt-in or opt-out basis to disclose to their subscribers a list of blocked calls upon request; (3) terminating voice service providers to provide a status update to the party that filed the dispute within 24 hours when a calling party disputes whether blocking its calls is appropriate; and (4) that the point of contact which terminating voice service providers have established to handle blocking disputes also handle contacts from callers that are adversely affected by information provided by caller ID authentication seeking to verify the authenticity of their calls.

- *One Ring Scams* (Sec. 12)*:* Requires the FCC initiate a proceeding on One-Ring Scams.
  - The Commission adopted a Notice of Proposed Rulemaking on April, 24, 2020.
  - The Commission adopted a Report and Order on November 24, 2020 clarifying that phone companies may lawfully block calls from numbers that are used to perpetrate one-ring scams. The Commission also ruled that phone companies that use reasonable analytics in good faith to identify and block one-ring scam calls will not be liable if they inadvertently block wanted calls.
  - The new rules became effective on February 12, 2021.
  - The Commission reported to Congress on December 7, 2020 regarding the status of the proceeding as required.
- *Hospital Robocall Protection Group* (Sec. 14)*:* Requires the FCC to establish the HRPG in order to develop best practices to protect hospitals from robocalls.
  - The Commission released a Public Notice on March 25, 2020 seeking nominations for the HRPG.
  - The Commission established the HRPG on June 25, 2020 and it held its first meeting on June 27, 2020.
  - The HRPG adopted its Best Practices on December 14, 2020.

TRACED ACT ENFORCEMENT-RELATED PROVISIONS

- *Enforcement Rule Revisions* (Sec. 3)*:* The FCC adopted an Order on May 1, 2020 to implement the required modifications to Section 227 of the Communications that: (1) allow the FCC to impose a penalty for violations without first issuing a citation; (2) provide additional penalties for intentional unlawful robocall violations of Section 227(b); (3) extend the statute of limitations period to four years for intentional violations of section 227(b); and (4) extend the statute of limitations period to four years for violations under section 227(e).
- *Traceback Efforts* (Sec. 13): Requires the Commission to establish a registration process for a single consortium that conducts private-led efforts to trace back the origin of

suspected unlawful robocalls and to seek public comment on traceback efforts before issuing an Annual Report.

  - The Commission sought comment on the traceback consortium registration process in a Notice of Proposed Rulemaking adopted on February 5, 2020.
  - The Commission adopted a Report and Order and Further Notice regarding the registration process on March 27, 2020.
  - The Commission selected the single consortium registered to conduct private-led traceback efforts via a Report and Order adopted on July 27, 2020.
  - The Commission issued a Public Notice on July 27, 2020 seeking comment on private-led efforts to trace back the source of suspected unlawful robocalls.
  - The required Annual Report followed on December 23, 2020.

- *Evidence Sharing with Department of Justice* (Sec. 11)*:* The Commission released its required Annual Report on December 23, 2020.
- *Annual Report on Enforcement* (Sec. 3)*:* The Commission released its required Annual Report on December 23, 2020.

OTHER TRACED ACT REQUIREMENTS

- *Interagency Working Group* (Sec. 5): The Commission participated in the Department of Justice's Interagency Working Group to study Government prosecution of violations of Sec. 227(b) of the Communications Act. Commission staff consulted with DOJ on its required Report to Congress.
- *Access to Number Resources Proceeding* (Sec. 6): Requires the FCC to commence a proceeding to examine whether and how our policies regarding access to both toll free and non-toll free numbering resources can be modified to help reduce access to numbers by potential perpetrators of illegal robocalls. Comments sought on these issues as part of a Further Notice of Proposed Rulemaking adopted on March 31, 2020.

ADDITIONAL UPCOMING DEADLINES

- *STIR/SHAKEN Review/Assessment Report to Congress* (Sec. 4): Due by December 30, 2022 (and every three years thereafter).
- *Streamlined Process for Sharing of Robocall/Spoofing Violations* (Sec. 10)*:*
  - Implementation of rules required by June 30, 2021.
  - The Commission adopted a Notice of Proposed Rulemaking on December 8, 2020.
  - Comment periods closed on February 18, 2021.
- *Study/Report to Congress on VOIP Requirements for Traceback* (Sec. 10)*:* Due by June 30, 2021.
- *Annual Public Notice Seeking Data on Private-Led Traceback Efforts* (Sec. 13): Due by July 27, 2021.

- *Conclude FCC Proceeding on Hospital Robocall Best Practices* (Sec. 14)*:* Not later than June 13, 2021.
    - Commission released a Public Notice on January 11, 2021 seeking comment on how to facilitate the voluntary adoption of the HRPG Best Practices to protect hospitals and other institutions.
    - Comment period closed on February 1, 2021.

Alethea Lewis

From: FCC OLA
Sent: Friday, May 1, 2020 12:06 PM
To: FCC OLA
Subject: FCCOLA NEWS: NEWS: FCC to Robocallers: There Will Be No More Warnings

If you have any questions, please contact Lori Maarbjerg at lori.maarbjerg@fcc.gov or 418-1908. The following release can be found at https://www.fcc.gov/document/fcc-adopts-rules-strengthening-enforcement-against-illegal-robocallers-0

Media Contact:
Will Wiquist, (202) 418-0509
will.wiquist@fcc.gov

For Immediate Release

FCC TO ROBOCALLERS: THERE WILL BE NO MORE WARNINGS

Agency Drops Citation Requirement and Extends Statute of Limitations

WASHINGTON, May 1, 2020—The Federal Communications Commission today issued an order that will end the practice of warning most robocallers before issuing penalties for violating the law and for harassing consumers with unwanted robocalls. Such warnings were previously required by law until the TRACED Act was enacted in December 2019.

Under the prior statutory requirement, the Commission had to issue robocallers that did not otherwise fall within its jurisdiction warnings—formally called citations—related to their alleged violations of the Telephone Consumer Protection Act (by, for example, robocalling cell phones without prior consumer consent) before the agency was able to move forward with an enforcement action. In addition, prior to the TRACED Act, any fine the Commission proposed for TCPA violations by robocallers could be based on violations that occurred only *after* the warning had been issued. While caller ID spoofing violations—namely, the use of spoofing to scam consumers—did not require warnings, the act of illegal robocalling by these scammers did.

"Robocall scam operators don't need a warning these days to know what they are doing is illegal, and this FCC has long disliked the statutory requirement to grant them mulligans," said FCC Chairman Ajit Pai. "We have taken unprecedented action against spoofing violations in recent years and removing this outdated 'warning' requirement will help us speed up enforcement to protect consumers. With strong enforcement and policy changes like mandating STIR/SHAKEN caller ID authentication and authorizing robocall blocking, we are making real progress in our fight against fraudsters."

In addition, today's FCC action extends the statute of limitations during which robocallers can be fined for TCPA and for spoofing violations. Until now, the FCC's Enforcement Bureau had either one or two years, respectively, from the day a violation took place to propose a fine, and only the violations that took place within that timeframe could be included when calculating the proposed

forfeiture. With today's change, the Commission has four years to propose a fine for spoofing and intentional robocall violations. The Order also increases the maximum fines for intentional robocall violations.

Under Chairman Pai, the FCC has taken unprecedented enforcement actions against spoofed robocallers under the Truth in Caller ID Act. These included a $120 million fine against a Florida-based time-share marketing operation, an $82 million fine against a North Carolina-based health insurance telemarketer, and a $37.5 million proposed fine of an Arizona marketer—all three of which were also issued citations for TCPA violations. The Enforcement Bureau and the Federal Trade Commission also recently pushed gateway providers to stop their suspected facilitation of COVID-19-related scam robocalls. Within 24 hours, those gateway providers stopped carrying those scam robocalls.

###

Media Relations: (202) 418-0500 / ASL: (844) 432-2275 / TTY: (888) 835-5322 / Twitter: @FCC / www fcc.gov

Alethea Lewis

From: FCC OLA
Sent: Tuesday, September 29, 2020 4:43 PM
To: FCC OLA
Subject: FCC-OLA NEWS: RELEASE: FCC Adopts New Rules to Combat Spoofed Robocalls

If you have any questions, please contact Lori Maarbjerg at lori.maarbjerg@fcc.gov. The following release can be accessed at https://www.fcc.gov/document/fcc-adopts-new-rules-combat-spoofed-robocalls

Media Contact:
Will Wiquist, (202) 418-0509
will.wiquist@fcc.gov

For Immediate Release

FCC TAKES MORE STEPS TO COMBAT SPOOFED ROBOCALLS

New Rules Promote Caller ID Authentication Across America's Phone Networks

WASHINGTON, September 30, 2020—The Federal Communications Commission today adopted new rules to further promote implementation of the STIR/SHAKEN caller ID authentication framework to protect consumers against malicious caller ID spoofing. The new rules make clear the obligations and deadlines for voice service providers regarding caller ID authentication, advance the use of caller ID authentication across the nation's phone networks, and prohibit voice service providers from adding any line item charges to the bills of consumer or small business customer subscribers for caller ID authentication technology.

Earlier this year, the FCC required that the STIR/SHAKEN framework—an Internet Protocol (IP) based standard—be implemented on IP-based phone networks by June 30, 2021. The Second Report and Order adopted today continues the FCC's work to combat illegally spoofed robocalls and implement the TRACED Act. The new rules require voice service providers to either upgrade their non-IP networks to IP and implement STIR/SHAKEN, or work to develop a non-IP caller ID authentication solution. They also require intermediate providers to implement STIR/SHAKEN so that IP calls retain caller ID authentication throughout the call path. And the new rules prohibit carriers from adding a line item to the bills of consumers and small businesses for caller ID authentication technology.

In the Order, the Commission grants limited extensions of the STIR/SHAKEN implementation deadline to small voice providers, voice service providers that are currently incapable of obtaining a "certificate" necessary to implement STIR/SHAKEN, services scheduled for discontinuance, and non-IP networks. The new rules stipulate that providers receiving an extension must implement robocall mitigation programs. By requiring robocall mitigation by providers that have not yet implemented caller ID authentication, the rules combat robocalls even from networks that aren't yet capable of participating in STIR/SHAKEN.

Caller ID authentication, based on STIR/SHAKEN standards, enables voice service providers to verify that the caller ID information transmitted with a call matches the caller's phone number. This effort started in 2017 with the FCC launching a formal inquiry on the best way to establish a reliable system to verify the caller ID information that appears on the recipient's phone. Following a number of rulemaking actions, an FCC summit, and implementation of the TRACED Act, this groundbreaking consumer protection technology is already helping consumers and will be fully implemented across major phone networks next year.

###

Media Relations: (202) 418-0500 / ASL: (844) 432-2275 / Twitter: @FCC / www fcc.gov

From:	Joy Medley
To:	evan.viau@mail.house.gov; kate.oconnor@mail.house.gov; "briana.connolly@mail.house.gov"; william.clutterbuck@mail.house.gov; David.Brodian@mail.house.gov
Cc:	Paul Jackson; Lori Maarbjerg
Subject:	Caller ID Authentication Implementation Progress Report
Date:	Tuesday, December 29, 2020 12:22:15 PM
Attachments:	Walden 12.29.20.pdf

Please see attached Report to Congress On Caller ID Authentication Implementation Progress. This report is submitted pursuant to Sections 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.
If you have any questions, please contact Lori Maarbjgerg at lori.maarbjerg@fcc.gov.

From:	Joy Medley
To:	alex.hoehn-saric@mail.house.gov; "jeff.carroll@mail.house.gov"; tiffany.guarascio@mail.house.gov; timothy.robinson@mail.house.gov; gerald.leverich@mail.house.gov; dan.miller@mail.house.gov; AJ.Brown@mail.house.gov; parul.desai@mail.house.gov; jennifer.epperson@mail.house.gov; james.johnsons@mail.house.gov
Cc:	Paul Jackson; Lori Maarbjerg
Subject:	Caller ID Authentication Implementation Progress Report
Date:	Tuesday, December 29, 2020 12:23:43 PM
Attachments:	Pallone 12.29.20.pdf

Please see attached Report to Congress On Caller ID Authentication Implementation Progress. This report is submitted pursuant to Sections 4 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.

If you have any questions, please contact Lori Maarbjgerg at lori.maarbjerg@fcc.gov.

From: FCC OLA
To: FCC OLA
Subject: FCC-OLA NEWS: RELEASE: STIR/SHAKEN Broadly Implemented Starting Today
Date: Wednesday, June 30, 2021 1:24:16 PM

If you have any questions, please contact Lori Maarbjerg at lori.maarbjerg@fcc.gov. The following release can be found at https://www.fcc.gov/document/stirshaken-broadly-implemented-starting-today

Media Contact:
Will Wiquist
will.wiquist@fcc.gov

For Immediate Release

STIR/SHAKEN BROADLY IMPLEMENTED STARTING TODAY

Caller ID Authentication Standard Is Now Used By the Largest Voice Service Providers, Helping Protect Consumers Against Spoofed Robocalls

WASHINGTON, June 30, 2021—FCC Acting Chairwoman Jessica Rosenworcel today announced that the largest voice service providers are now using STIR/SHAKEN caller ID authentication standards in their IP networks, in accordance with the deadline set by the FCC. This widespread implementation helps protect consumers against malicious spoofed robocalls and helps law enforcement track bad actors. The STIR/SHAKEN standards serve as a common digital language used by phone networks, allowing valid information to pass from provider to provider which, among other things, informs blocking tools of possible suspicious calls.

"At last, STIR/SHAKEN standards are a widely used reality in American phone networks," said Rosenworcel. "While there is no silver bullet in the endless fight against scammers, STIR/SHAKEN will turbo-charge many of the tools we use in our fight against robocalls: from consumer apps and network-level blocking, to enforcement investigations and shutting down the gateways used by international robocall campaigns. This is a good day for American consumers who – like all of us – are sick and tired of illegal spoofed robocalls."

Implementation of caller ID authentication technology using the STIR/SHAKEN standards will reduce the effectiveness of illegal spoofing, allow law enforcement to identify bad actors more easily, and help voice service providers identify calls with illegally spoofed caller ID information before those calls reach their subscribers. The FCC set a deadline for large voice service providers to implement STIR/SHAKEN by June 30, 2021 in the IP portions of their networks. The Commission also granted small voice service providers with 100,000 or fewer subscriber lines an extension until June 30, 2023 but is formally considering shortening that extension for a subset of these providers in light of new evidence indicating that they are originating a high and increasing quantity of illegal robocalls.

In April, the FCC launched the Robocall Mitigation Database in which voice service providers must now file certifications to inform the agency of their robocall mitigation efforts, including

their STIR/SHAKEN implementation status. Beginning on September 28, 2021, if a voice service provider's certification does not appear in the database, intermediate and voice service providers will be prohibited from directly accepting the provider's traffic. To date, over 1,500 voice service providers have filed in the database. Over 200 voice service providers have certified to full STIR/SHAKEN implementation and hundreds more have certified to partial implementation—generally certifying to full implementation on the IP portions of their networks. Those certifying to anything short of full STIR/SHAKEN implementation must describe the new steps they are taking to ensure they are not the source of illegal robocalls.

While STIR/SHAKEN will improve the quality of caller ID information, it does not mean the call itself is legitimate. This improved information will help verify the phone number from which the call was made – or flag that it is not verified – and help blocking services both at the consumer level and before the call reaches the consumer. But consumers should remain vigilant against robocall scammers. The FCC is committed to continuing to fight against malicious spoofing and scam robocalls.

###

Media Relations: (202) 418-0500 / ASL: (844) 432-2275 / Twitter: @FCC / www.fcc.gov

From: Wender, Joseph (Markey)
To: Lori Maarbjerg
Cc: Sachtjen, Alex (Thune); Butler, Bennett (Markey)
Subject: Re: FCC-OLA NEWS: RELEASE: FCC Adopts New Rules to Combat Spoofed Robocalls
Date: Tuesday, September 29, 2020 4:44:45 PM

Hey how is this different than what's happening on Thursday? Thanks.

Sent from my iPhone

> On Sep 29, 2020, at 4:43 PM, FCC OLA <FCCOLA@fcc.gov> wrote:
>
> If you have any questions, please contact Lori Maarbjerg at lori.maarbjerg@fcc.gov. The following release can be accessed at https://www.fcc.gov/document/fcc-adopts-new-rules-combat-spoofed-robocalls
>
> ***<image002.jpg>***
>
> **Media Contact:**
> Will Wiquist, (202) 418-0509
> will.wiquist@fcc.gov
> **For Immediate Release**
>
> **FCC TAKES MORE STEPS TO COMBAT SPOOFED ROBOCALLS**
>
> ***New Rules Promote Caller ID Authentication Across America's Phone Networks***
>
> WASHINGTON, September 30, 2020—The Federal Communications Commission today adopted new rules to further promote implementation of the STIR/SHAKEN caller ID authentication framework to protect consumers against malicious caller ID spoofing. The new rules make clear the obligations and deadlines for voice service providers regarding caller ID authentication, advance the use of caller ID authentication across the nation's phone networks, and prohibit voice service providers from adding any line item charges to the bills of consumer or small business customer subscribers for caller ID authentication technology.
> Earlier this year, the FCC required that the STIR/SHAKEN framework—an Internet Protocol (IP) based standard—be implemented on IP-based phone networks by June 30, 2021. The Second Report and Order adopted today continues the FCC's work to combat illegally spoofed robocalls and implement the TRACED Act. The new rules require voice service providers to either upgrade their non-IP networks to IP and implement STIR/SHAKEN, or work to develop a non-IP caller ID authentication solution. They also require intermediate providers to implement STIR/SHAKEN so that IP calls retain caller ID authentication throughout the call path. And the new rules prohibit carriers from adding a line item to the bills of consumers and small businesses for caller ID authentication technology.
> In the Order, the Commission grants limited extensions of the STIR/SHAKEN implementation deadline to small voice providers, voice service providers that are currently incapable of obtaining a "certificate" necessary to implement STIR/SHAKEN, services scheduled for discontinuance, and non-IP networks. The

new rules stipulate that providers receiving an extension must implement robocall mitigation programs. By requiring robocall mitigation by providers that have not yet implemented caller ID authentication, the rules combat robocalls even from networks that aren't yet capable of participating in STIR/SHAKEN.

Caller ID authentication, based on STIR/SHAKEN standards, enables voice service providers to verify that the caller ID information transmitted with a call matches the caller's phone number. This effort started in 2017 with the FCC launching a formal inquiry on the best way to establish a reliable system to verify the caller ID information that appears on the recipient's phone. Following a number of rulemaking actions, an FCC summit, and implementation of the TRACED Act, this groundbreaking consumer protection technology is already helping consumers and will be fully implemented across major phone networks next year.

###

From:	Wender, Joseph (Markey)
To:	Lori Maarbjerg
Cc:	Sachtjen, Alex (Thune); Butler, Bennett (Markey)
Subject:	RE: FCC-OLA NEWS: SUNSHINE NOTICE: September Open Commission Meeting
Date:	Friday, September 25, 2020 11:59:31 AM

Great, thanks!

Joseph Wender
Senior Policy Advisor
Office of Senator Edward J. Markey
255 Dirksen Senate Office Building
(202) 224-2742
Joseph_Wender@markey.senate.gov

From: Lori Maarbjerg <Lori.Maarbje@fcc.gov>
Sent: Friday, September 25, 2020 11:52 AM
To: Wender, Joseph (Markey) <Joseph_Wender@markey.senate.gov>
Cc: Sachtjen, Alex (Thune) <Alex_Sachtjen@thune.senate.gov>; Butler, Bennett (Markey) <Bennett_Butler@markey.senate.gov>
Subject: RE: FCC-OLA NEWS: SUNSHINE NOTICE: September Open Commission Meeting

Here's the outline from the public draft:

What the Second Report and Order Would Do:

• Require voice service providers to either upgrade their non-IP networks to IP and implement STIR/SHAKEN, or work to develop a non-IP caller ID authentication solution.

• Establish extensions of the June 30, 2021 caller ID authentication implementation deadline for small voice service providers, voice service providers that are currently incapable of obtaining a "certificate" necessary to implement STIR/SHAKEN, services scheduled for discontinuance, and non-IP networks.

• Require voice service providers subject to an extension to implement a robocall mitigation program on the non-STIR/SHAKEN-enabled portions of their networks.

• Require all voice service providers to file a certification in a Commission database showing how they are acting to stem the origination of illegal robocalls.

• Establish a process by which providers that make early progress on caller ID authentication implementation can obtain an exemption from the June 30, 2021 deadline, as required by the TRACED Act.

• Prohibit voice service providers from adding any line item charges to the bills of consumer or small business customer subscribers for caller ID authentication technology, as required by the TRACED Act.

• Require intermediate providers to implement the STIR/SHAKEN caller ID authentication framework in the IP portions of their networks by June 30, 2021.

From: Wender, Joseph (Markey) <Joseph_Wender@markey.senate.gov>
Sent: Friday, September 25, 2020 11:10 AM
To: Lori Maarbjerg <Lori.Maarbje@fcc.gov>
Cc: Sachtjen, Alex (Thune) <Alex_Sachtjen@thune.senate.gov>; Butler, Bennett (Markey) <Bennett_Butler@markey.senate.gov>
Subject: RE: FCC-OLA NEWS: SUNSHINE NOTICE: September Open Commission Meeting

Hey Lori,

Can you send us a little more info on the robocall item below? How does it fit in with the Commission's previous efforts to implement TRACED?

Thanks,

Joey

Joseph Wender
Senior Policy Advisor
Office of Senator Edward J. Markey
255 Dirksen Senate Office Building
(202) 224-2742
Joseph_Wender@markey.senate.gov

From: FCC OLA <FCCOLA@fcc.gov>
Sent: Wednesday, September 23, 2020 5:32 PM
To: FCC OLA <FCCOLA@fcc.gov>
Subject: FCC-OLA NEWS: SUNSHINE NOTICE: September Open Commission Meeting

The FCC will hold the September Open Meeting on September 30 at 10:30am. Items scheduled for consideration are listed below with links to the public draft as well as OLA contact information. The official Commission Meeting Agenda as well as instructions to access the live feed of the meeting can be found at https://www.fcc.gov/document/fcc-hold-open-commission-meeting-wednesday-september-30-2020.

Also, Chairman Pai's recent blogpost "A Big Fall Kickoff" can be accessed at the following link: https://www.fcc.gov/news-events/blog/2020/09/08/big-fall-kickoff

- **Facilitating Shared Use in the 3.1-3.55 GHz Band:** The Commission will consider a Report and Order that would remove the existing non-federal allocations from the 3.3-3.55 GHz band as an important step toward making 100 megahertz of spectrum in the 3.45-3.55 GHz band available for commercial use, including 5G, throughout the contiguous United States. The Commission will also consider a Further Notice of Proposed Rulemaking that would propose to add a co-primary, non-federal fixed and mobile (except aeronautical mobile) allocation to the 3.45-3.55 GHz band as well as service, technical, and competitive bidding rules for flexible-use licenses in the band. (WT Docket No. 19-348) **(OLA Contact**: Becca Brown at Rebecca.brown@fcc.gov)
- **Expanding Access to and Investment in the 4.9 GHz Band:** The Commission will consider a Sixth Report and Order that would expand access to and investment in the 4.9 GHz (4940-4990 MHz) band by providing states the opportunity to lease this spectrum to commercial entities, electric utilities, and others for both public safety and non-public safety purposes. The Commission also will consider a Seventh Further Notice of Proposed Rulemaking that would propose a new set of licensing rules and seek comment on ways to further facilitate access to and investment in the band. (WP Docket No. 07-100) **(OLA Contact**: Becca Brown at Rebecca.brown@fcc.gov)
- **Improving Transparency and Timeliness of Foreign Ownership Review Process:** The Commission will consider a Report and Order that would improve the timeliness and transparency of the process by which it seeks the views of Executive Branch agencies on any national security, law enforcement, foreign policy, and trade policy concerns related to certain applications filed with the Commission. (IB Docket No. 16-155) **(OLA Contact**: Lori Maarbjerg at Lori.maarbjerg@fcc.gov)
- **Promoting Caller ID Authentication to Combat Spoofed Robocalls:** The Commission will consider a Report and Order that would continue its work to implement the TRACED Act and promote the deployment of caller ID authentication technology to combat spoofed robocalls. (WC Docket No. 17-97) **(OLA Contact**: Lori Maarbjerg at lori.maarbjerg@fcc.gov)
- **Combating 911 Fee Diversion:** The Commission will consider a Notice of Inquiry that would seek comment on ways to dissuade states and territories from diverting fees collected for 911

to other purposes. (PS Docket Nos. 20-291, 09-14) **(OLA Contact**: Becca Brown at Rebecca.brown@fcc.gov)

- **Modernizing Cable Service Change Notifications:** The Commission will consider a Report and Order that would modernize requirements for notices cable operators must provide subscribers and local franchising authorities. (MB Docket Nos. 19-347, 17-105) **(OLA Contact**: Lori Maarbjerg at lori.maarbjerg@fcc.gov)
- **Eliminating Records Requirements for Cable Operator Interests in Video Programming:** The Commission will consider a Report and Order that would eliminate the requirement that cable operators maintain records in their online public inspection files regarding the nature and extent of their attributable interests in video programming services. (MB Docket No. 20-35, 17-105) **(OLA Contact**: Lori Maarbjerg at lori.maarbjerg@fcc.gov)
- **Reforming IP Captioned Telephone Service Rates and Service Standards:** The Commission will consider a Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking that would set compensation rates for Internet Protocol Captioned Telephone Service (IP CTS), deny reconsideration of previously set IP CTS compensation rates, and propose service quality and performance measurement standards for captioned telephone services. (CG Docket Nos. 13-24, 03-123) **(OLA Contact**: Lori Maarbjerg at lori.maarbjerg@fcc.gov)
- **Enforcement Item:** The Commission will consider an enforcement action.

September 23, 2020

FCC TO HOLD OPEN COMMISSION MEETING
WEDNESDAY, SEPTEMBER 30, 2020

The Federal Communications Commission will hold an Open Meeting on the subjects listed below on Wednesday, September 30, 2020, which is scheduled to commence at 10:30 a.m. Due to the current COVID-19 pandemic and related agency telework and headquarters access policies, this meeting will be in a wholly electronic format and will be open to the public on the Internet via live feed from the FCC's web page at www.fcc.gov/live and on the FCC's YouTube channel.

ITEM NO.	BUREAU	SUBJECT
1	WIRELESS TELE-COMMUNICATIONS	**TITLE:** Facilitating Shared Use in the 3.1-3.55 GHz Band (WT Docket No. 19-348) **SUMMARY:** The Commission will consider a Report and Order that would remove the existing non-federal allocations from the 3.3-3.55 GHz band as an important step toward making 100 megahertz of spectrum in the 3.45-3.55 GHz band available for commercial use, including 5G, throughout the contiguous United States. The Commission will also consider a Further Notice of Proposed Rulemaking that would propose to add a co-primary, non-federal fixed and mobile (except aeronautical mobile) allocation to the 3.45-3.55 GHz band as well as service, technical, and competitive bidding rules for flexible-use licenses in the band.
2	WIRELESS TELE-COMMUNICATIONS	**TITLE:** Expanding Access to and Investment in the 4.9 GHz Band (WT Docket No. 07-100) **SUMMARY:** The Commission will consider a Sixth Report and Order that would expand access to and investment in the 4.9 GHz (4940-4990 MHz) band by providing states the

		opportunity to lease this spectrum to commercial entities, electric utilities, and others for both public safety and non-public safety purposes. The Commission also will consider a Seventh Further Notice of Proposed Rulemaking that would propose a new set of licensing rules and seek comment on ways to further facilitate access to and investment in the band.
3	**INTERNATIONAL**	**TITLE:** Improving Transparency and Timeliness of Foreign Ownership Review Process (IB Docket No. 16-155) **SUMMARY:** The Commission will consider a Report and Order that would improve the timeliness and transparency of the process by which it seeks the views of Executive Branch agencies on any national security, law enforcement, foreign policy, and trade policy concerns related to certain applications filed with the Commission.
4	**WIRELINE COMPETITION**	**TITLE:** Promoting Caller ID Authentication to Combat Spoofed Robocalls (WC Docket No. 17-97) **SUMMARY:** The Commission will consider a Report and Order that would continue its work to implement the TRACED Act and promote the deployment of caller ID authentication technology to combat spoofed robocalls.
5	**PUBLIC SAFETY AND HOMELAND SECURITY**	**TITLE:** Combating 911 Fee Diversion (PS Docket Nos. 20-291, 09-14) **SUMMARY:** The Commission will consider a Notice of Inquiry that would seek comment on ways to dissuade states and territories from diverting fees collected for 911 to other purposes.
6	**MEDIA**	**TITLE:** Modernizing Cable Service Change Notifications (MB Docket No. 19-347); Modernization of Media Regulation Initiative (MB Docket No. 17-105) **SUMMARY:** The Commission will consider a Report and Order that would modernize requirements for notices cable operators must provide subscribers and local franchising authorities.
7	**MEDIA**	**TITLE:** Eliminating Records Requirements for Cable Operator Interests in Video Programming (MB Docket No. 20-35); Modernization of Media Regulation Initiative (MB Docket No. 17-105) **SUMMARY:** The Commission will consider a

		Report and Order that would eliminate the requirement that cable operators maintain records in their online public inspection files regarding the nature and extent of their attributable interests in video programming services.
8	**CONSUMER & GOVERNMENTAL AFFAIRS**	**TITLE:** Reforming IP Captioned Telephone Service Rates and Service Standards (CG Docket Nos. 13-24, 03-123) **SUMMARY:** The Commission will consider a Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking that would set compensation rates for Internet Protocol Captioned Telephone Service (IP CTS), deny reconsideration of previously set IP CTS compensation rates, and propose service quality and performance measurement standards for captioned telephone services.
9	**ENFORCEMENT**	**TITLE:** Enforcement Item **SUMMARY:** The Commission will consider an enforcement action.

The meeting will be webcast with open captioning at: www.fcc.gov/live. Open captioning will be provided as well as a text only version on the FCC website. Other reasonable accommodations for people with disabilities are available upon request. In your request, include a description of the accommodation you will need and a way we can contact you if we need more information. Last minute requests will be accepted but may be impossible to fill. Send an e-mail to: fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530.

Additional information concerning this meeting may be obtained from the Office of Media Relations, (202) 418-0500. Audio/Video coverage of the meeting will be broadcast live with open captioning over the Internet from the FCC Live web page at www.fcc.gov/live.

-FCC-

From:	Viau, Evan
To:	Lori Maarbjerg
Cc:	Jim Balaguer
Subject:	RE: Robocall Actions
Date:	Wednesday, June 9, 2021 1:06:14 PM

Thank you so much Lori, this is very helpful.

Have a great rest of your week!

-Evan

From: Lori Maarbjerg <Lori.Maarbje@fcc.gov>
Sent: Wednesday, June 9, 2021 12:18 PM
To: Viau, Evan <Evan.Viau@mail.house.gov>
Cc: Jim Balaguer <Jim.Balaguer@fcc.gov>
Subject: Robocall Actions

Hi there. I've collected a few links below to assist you re: what the FCC has been doing in the last 6 months on robocalls. I hope this helps! Please let me know if you have any questions.

Here's the robocall initiative webpage: https://www.fcc.gov/spoofed-robocalls

Here's a link to our TRACED Act implementation page: https://www.fcc.gov/TRACEDAct

In April, we released a PN seeking comment for the Second Call Blocking Report, issued two Cease-and-Desist letters: https://www.fcc.gov/document/fcc-announces-push-robocall-blocking-consumer-resources

On May 21, 2021, we adopted the STIR-SHAKEN FNPRM: https://www.fcc.gov/document/fcc-proposes-new-stirshaken-date-possible-robocall-facilitators-0

Recent EB Actions:

MOUs:

- https://www.fcc.gov/document/fcc-signs-robocall-enforcement-mou-australian-partners
- [Note that on the phone I referenced an MOU with South Africa, but that wasn't specific to robocalls].

Cease-and-Desist Letters:

- https://www.fcc.gov/document/fcc-demands-two-companies-cease-and-desist-illegal-robocall-campaigns
- https://www.fcc.gov/document/fcc-issues-robocall-cease-and-desist-letters-six-voice-providers

Forfeiture Orders:

- https://www.fcc.gov/document/fcc-issues-record-225-million-fine-spoofed-robocalls
- https://www.fcc.gov/document/fcc-fines-robocaller-nearly-10-million-malicious-spoofing

Lori Holy Maarbjerg
Chief of Staff/Senior Attorney-Advisor
Office of Legislative Affairs
Federal Communications Commission
202-391-2362 (work cell)
202-418-1908 (direct)
202-418-1900 (main)

From:	Joy Medley
To:	"john_branscome@commerce.senate.gov"; "shawn_bone@commerce.senate.gov"; "Betsy_McIntyre@commerce.senate.gov"; "narda_jones@cantwell.senate.gov"; "Brian_McDermott@commerce.senate.gov"
Cc:	Paul Jackson; Lori Maarbjerg
Subject:	Robocalls and Transmission of Misleading or Inaccurate Caller Identification Information Report to Congress
Date:	Wednesday, December 23, 2020 2:56:58 PM
Attachments:	Cantwell TRACED Act - Section 3 11 13.pdf USTelecom Letter re Status of Private-Led Traceback Efforts.pdf USTelecom_ITG-Policies-and-Procedures_Jan-2020.pdf USTelecom-Consortium-Application.pdf List of All and Non-Responsive Providers - 12-8-2020.xlsx

---

Due to an earlier glitch, this email is being resent with a link to the attached report. Apologies for any confusion.

Attached is the Robocalls and Transmission of Misleading or Inaccurate Caller Identification Information Report to Congress with related attachments. This report is submitted pursuant to Sections 3, 11, and 13 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.

If you have any questions, please contact Lori Maarbjerg at lori.maarbjerg@fcc.gov.

From:	Joy Medley
To:	"philip.murphy@mail.house.gov"
Cc:	Paul Jackson; Lori Maarbjerg
Subject:	Robocalls and Transmission of Misleading or Inaccurate Caller Identification Information Report to Congress
Date:	Wednesday, December 23, 2020 2:55:57 PM
Attachments:	Doyle TRACED Act - Section 3 11 13.pdf List of All and Non-Responsive Providers - 12-8-2020.xlsx USTelecom Letter re Status of Private-Led Traceback Efforts.pdf USTelecom_ITG-Policies-and-Procedures_Jan-2020.pdf USTelecom-Consortium-Application.pdf

---

Due to an earlier glitch, this email is being resent with a link to the attached report. Apologies for any confusion.

Attached is the Robocalls and Transmission of Misleading or Inaccurate Caller Identification Information Report to Congress with related attachments. This report is submitted pursuant to Sections 3, 11, and 13 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.

If you have any questions, please contact Lori Maarbjerg at lori.maarbjerg@fcc.gov.

From:	Joy Medley
To:	"Kelsey_Guyselman@commerce.senate.gov"; "olivia_trusty@commerce.senate.gov"; "John_Lin@commerce.senate.gov"; "reed_cook@commerce.senate.gov"; "kevin_holmes@commerce.senate.gov"
Cc:	Lori Maarbjerg; Paul Jackson
Subject:	Robocalls and Transmission of Misleading or Inaccurate Caller Identification Information Report to Congress
Date:	Wednesday, December 23, 2020 3:01:23 PM
Attachments:	Wicker TRACED Act - Section 3 11 13.pdf List of All and Non-Responsive Providers - 12-8-2020.xlsx USTelecom Letter re Status of Private-Led Traceback Efforts.pdf USTelecom_ITG-Policies-and-Procedures_Jan-2020.pdf USTelecom-Consortium-Application.pdf

---

Due to an earlier glitch, this email is being resent with a link to the attached report. Apologies for any confusion.

Attached is the Robocalls and Transmission of Misleading or Inaccurate Caller Identification Information Report to Congress with related attachments. This report is submitted pursuant to Sections 3, 11, and 13 of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), Pub. L. No. 116-105.

If you have any questions, please contact Lori Maarbjerg at lori.maarbjerg@fcc.gov.

CAROLYN B. MALONEY, NEW YORK
CHAIRWOMAN

ONE HUNDRED SEVENTEENTH CONGRESS

JAMES COMER, KENTUCKY
RANKING MINORITY MEMBER

Congress of the United States
House of Representatives

COMMITTEE ON OVERSIGHT AND REFORM
2157 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6143
MAJORITY (202) 225–5051
MINORITY (202) 225–5074
https://oversight.house.gov

August 20, 2021

The Honorable Jessica Rosenworcel
Acting Chairwoman
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Dear Acting Chairwoman Rosenworcel:

The Subcommittee on Economic and Consumer Policy is writing to request information about the ongoing efforts of the Federal Communications Commission (FCC) to address spam text messages. Last year scammers stole at least $86 million through fraud originating in spam texts. The median amount consumers lost in these scams was $800.[1]

Since June 30, 2021, FCC has required phone service providers to implement "STIR/SHAKEN" technology to combat robocalls by verifying the sources of the calls.[2] This technology will help reduce the number of robocalls consumers receive and will allow FCC to identify bad actors and hold them accountable.

As STIR/SHAKEN has its intended effect of reducing the effectiveness of robocalls, bad actors will likely shift their attention to other means of scamming consumers. Spam texts appear to be a likely vehicle for scammers to use.

In 2019, the House of Representatives passed the Stopping Bad Robocalls Act, which, if enacted, would provide further protections for consumers against robocalls and robotexts.[3]

---

[1] Federal Trade Commission, *Consumer Sentinel Network Data Book 2020* (Feb. 2021) (online at www ftc.gov/system/files/documents/reports/consumer-sentinel-network-data-book-2020/csn_annual_data_book_2020.pdf).

[2] Federal Communications Commission, *Press Release: STIR/SHAKEN Broadly Implemented Starting Today* (June 30, 2021) (online at https://docs fcc.gov/public/attachments/DOC-373714A1.pdf). STIR stands for "secure telephone identity revisited," and SHAKEN stands for "signature-based handling of asserted information using tokens."

[3] H.R. 3375, 116th Cong. (2019).

In Illinois, we have seen a rise in spam texts, many designed to appear as if they are coming from Illinois government agencies.[4] In March 2021, Illinois received the third-most spam texts per capita. Of the 7.4 billion spam texts sent to Americans in March, Illinoisans received an estimated 301,190,677. Illinois's 28 spam texts per capita during the month trailed the per capita numbers of only Texas and Georgia.[5]

We want to be able to inform our constituents about the important work that FCC is doing to protect them from spam texts, and we want to be able to give them the best advice on how to protect themselves from scams. To assist the Subcommittee in this matter, please contact Subcommittee staff by August 27, 2021, to set up a staff briefing on FCC's efforts to address spam texts.

The Committee on Oversight and Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X. If you have any questions regarding this request, please contact Subcommittee staff at (202) 225-5051.

Sincerely,

Raja Krishnamoorthi
Chairman
Subcommittee on Economic and Consumer Policy

cc: The Honorable Michael Cloud, Ranking Member
Subcommittee on Economic and Consumer Policy

[4] *Illinois Residents Targeted By Scam Text Messages*, WGN 9 (May 27, 2021) (online at https://wgntv.com/news/illinois-residents-targeted-by-scam-text-messages/).

[5] *Press Release: Robocall Record: 7.4 Billion Spam Texts Surpass Total Robocalls by More than One Billion Messages in March 2021*, RoboKiller (Apr. 1, 2021) (online at www.prnewswire.com/news-releases/robocall-record-7-4-billion-spam-texts-surpass-total-robocalls-by-more-than-1-billion-messages-in-march-2021--301260890.html).