

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

In the Matter of	)	
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97



By: /s/ Michael R. Romano  
Michael R. Romano  
Senior Vice President –  
Industry Affairs & Business Development  
[mromano@ntca.org](mailto:mromano@ntca.org)

By: /s/ Brian J. Ford  
Brian J. Ford  
Director of Industry Affairs  
[bford@ntca.org](mailto:bford@ntca.org)

4121 Wilson Boulevard, Suite 1000  
Arlington, VA 22203

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**COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION**

**I. INTRODUCTION/SUMMARY & STATEMENT OF INTEREST**

NTCA–The Rural Broadband Association (“NTCA”)<sup>1</sup> hereby submits these comments in response to the *Public Notice*<sup>2</sup> released by the Federal Communications Commission (“Commission”) in the above-captioned proceedings. The *Public Notice* seeks comment on the availability and effectiveness of call-blocking tools to inform a pending report (“*Call Blocking Report*”) that will be issued by the Commission’s Consumer and Governmental Affairs, Wireline Competition, and Public Safety and Homeland Security Bureaus (“Bureaus”).<sup>3</sup>

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<sup>1</sup> NTCA represents approximately 850 rural rate-of-return regulated telecommunications providers (“RLECs”). All of NTCA’s members are full service local exchange carriers and broadband providers, and many of its members provide wireless, cable, satellite, and long distance and other competitive services to their communities. As a founding member of the Secure Telephone Identity Governance Authority (“STI-GA”) Board of Directors, NTCA has put its members’ commitment to protecting rural consumers and combatting the scourge of caller-ID spoofing into action with time and financial resources dedicated to the creation of the STI-GA.

<sup>2</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, *Call Authentication Trust Anchor*, WC Docket No. 17-97, Public Notice, FCC 19-1312 (rel. Dec. 20, 2019) (“*Public Notice*”).

<sup>3</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, *Call Authentication Trust Anchor*, WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, FCC 19-51 (rel. Jun. 7, 2019), ¶ 87 (directing the bureaus to “prepare two reports on the state of deployment of advanced methods and tools to eliminate such calls, including the impact of call blocking on 911 and public safety”).

To ensure a comprehensive assessment of the effectiveness of call blocking tools, in addition to discussing whether and to what degree such tools help consumers avoid unwanted robocalls, the Bureaus' *Call Blocking Report* must also account for the potential unintended negative implications of these tools on consumers if not calibrated carefully. The *Call Blocking Report* should specifically identify and explore actions the Commission can take to protect consumers from “false positives,” or legitimate calls blocked in error, through the use of call blocking tools.

False positives represent a very real concern for rural consumers and the operators that serve them. While the majority of smaller rural carriers have the technical ability within their own networks to implement the SHAKEN/STIR caller-ID “spoofing” mitigation standard, as discussed further herein, implementation within rural networks alone is insufficient for these carriers and the consumers they serve to realize the benefits of this framework. As described below, IP interconnection concerns – and lingering TDM facilities in some places – will complicate, if not preclude, the implementation of SHAKEN/STIR in rural markets, resulting in legitimate and wanted (by the called party) calls from rural areas being caught up by call blocking tools in error. Such a result could create a “rural reverse call completion” problem that prevents millions of rural consumers from communicating via voice call with the rest of the world. The Commission should consider what measures it can require to promote IP interconnection between networks to make possible universal implementation of SHAKEN/STIR on IP-enabled networks, and also how it can encourage development of alternatives that will enable authentication to be generated and transmitted across TDM network facilities as well pending completion of the IP transition in all networks. Finally, the *Call Blocking Report* should consider how those providers utilizing call-blocking technologies can assist a consumer whose

calls have been blocked in error. The proposals discussed herein are intended to ensure that consumers mistakenly placed on a “blacklist” can remedy the situation in short order.

In short, the inquiry here must go deeper than a mere focus on whether call blocking tools are available or effective – *all* of the implications associated with use of these tools, positive and negative, should be captured and analyzed in any reasonable and comprehensive assessment of their capabilities. The Commission has a responsibility to rural consumers to recognize and address these questions holistically, and a complete analysis in the *Call Blocking Report* of the benefits and concerns arising out of the use of call blocking tools is an imperative to protect the continued reliability of voice communications in the United States.

**II. ABSENT STEPS TO ENABLE RURAL PROVIDER PARTICIPATION IN THE SHAKEN/STIR ECOSYSTEM, AS WELL AS “GUARDRAILS” AROUND ANY CALL BLOCKING AUTHORITY GRANTED TO VOICE SERVICE PROVIDERS, THERE IS A SERIOUS RISK OF A “REVERSE CALL COMPLETION” PROBLEM EMERGING IN RURAL AMERICA.**

**A. A “reverse rural call completion” problem is a very real possibility absent Commission action in this proceeding.**

Like providers all across the country (and the Commission itself), RLECs receive a large number of consumer complaints about unwanted robocalls, and instances of unwanted calls that include caller-ID spoofing often top the list of complaints. As community-based providers, RLECs take seriously their duty to provide trustworthy and reliable communications services to rural Americans, and they are committed to utilizing every tool they can to mitigate the incidence of unwanted calls to their subscribers. In service of that commitment, RLECs were supportive of the Commission’s action to clarify voice providers’ legal authority to block unwanted or illegal

calls,<sup>4</sup> and they are actively working to adopt call authentication solutions to combat caller-ID spoofing.

At the same time as measures to block illegitimate and unwanted calls are being considered, it is equally important to ensure that voice calls complete, and that calls are not blocked or dropped through intent or inadvertence. A decade-long fight against rural call completion problems – in which untold numbers of calls to rural consumers simply never arrived – instructs that the reliability of the telephone network cannot be taken for granted. After a decade of RLECs working to bring this problem to the attention of policymakers and searching for solutions, a mix of enforcement efforts and new and revised rules helped to give operators proper incentives to complete calls destined for rural areas – and to punish those that failed to do so.<sup>5</sup>

With respect to the instant proceeding, there is serious risk that a rural call completion problem similar to the one discussed above could emerge again in rural America – this time, however, it would be “in reverse,” with calls *from* rural Americans to urban areas being blocked. If call blocking tools are deployed without proper thought and calibration, and in light of persistent barriers to authentication of calls originating in rural markets as described further herein, millions of rural consumers could find themselves unable to reliably call family or friends in urban areas, contact potential employers or customers, or keep in touch with doctors and other medical providers outside of their local, rural calling areas. Rural businesses could find themselves unable to reliably contact customers, and damage to the rural economy could soon follow.

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<sup>4</sup> *Id.*, ¶¶ 22-47.

<sup>5</sup> *Rural Call Completion*, WC Docket No. 13-39, Fourth Report and Order, FCC 19-23 (rel. Mar. 15, 2019).

Such concerns could come to pass for several reasons, chief among them the barriers to the implementation in rural areas of SHAKEN/STIR, a standard adopted to mitigate caller-ID spoofing. One significant barrier includes not only the hardware and software necessary for the generation of authentication information, but also any other ancillary network upgrades that will be necessary as a result. Many of these costs are not expected to be just “one-time” investments but rather will come in the form of substantial annual financial outlays that could be untenable for smaller, rural providers.

More importantly, however, the lack of consistency in and widespread availability of IP interconnection agreements for the exchange of voice traffic likely represent *the primary barrier* to successful implementation of the SHAKEN/STIR framework – and thus the greatest risk in terms of legitimate calls being blocked. As the Commission knows full well, SHAKEN/STIR depends upon the hand-off of calls in IP format between every network along the call path – the authenticated caller-ID information generated by the originating carrier will not transfer otherwise. As discussed further below in Section II. B., *infra*, an interconnection barrier exists in rural areas, however, due mostly to the presence of TDM facilities utilized by the upstream carriers through which RLECs originate and terminate voice traffic, as well as the lack of “rules of the road” that incent providers of all sizes to enter into agreement for IP voice traffic even where IP facilities do exist. Thus, even if RLECs are “all IP” and invest in the SHAKEN/STIR infrastructure within their own networks as part of their commitment to protecting their consumers, the end-to-end all-IP nature of this standard will render that investment useless – and could result in calls from rural users being blocked as “untrustworthy” when they are anything but.

Indeed, this inability to implement in rural areas the SHAKEN/STIR ecosystem (*i.e.*, authenticate calls as they are passed to terminating carriers) is highly likely to lead to the “reverse rural call completion” danger discussed herein – if calls from rural consumers appear unauthenticated when reaching urban areas because IP interconnection does not exist between larger national operators and small rural carriers, there is serious risk that legitimate calls from rural customers will go unanswered by urban consumers because they *appear* “untrustworthy.” Moreover, it is quite possible that ill-intentioned spoofers will migrate to rural telephone numbers, further undermining trust in calls from rural markets and leading to an even greater number of calls failing to be answered by urban consumers. Finally, the increased use of call blocking applications could result in legitimate calls from rural areas being blocked altogether simply because they cannot be authenticated due to the barriers highlighted above, particularly if such blocking tools cannot differentiate between legitimate calls made from rural areas and those made using rural telephone numbers attached to calls made by spoofers in other parts of the country or the world. Ultimately, the inability to implement SHAKEN/STIR – due in significant part to an inability for small rural providers to obtain IP interconnection arrangements on reasonable terms – could leave millions of rural consumers with calls that get blocked far too often in trying to reach the rest of the world.

It is all the more troubling when one considers that, absent certain safeguards, those trapped in this “reverse rural call completion” scenario may find themselves with no easy way out. Without a process in place where a rural consumer can easily remove themselves from any “blacklists,” legitimate and wanted (by the called party) calls could continue to be blocked in perpetuity. Even worse, much as was seen in the days of rural call completion problems, callers on the originating side may be forced to resort to emailing or otherwise reaching relatives or

friends (or potential employers) because calls fail to complete for reasons they do not understand. This is not to mention the fact that many callers will not understand why their calls are being blocked and thus may be forced into “investigating” the source of their inability to suddenly dial outside rural America – inefficiently consuming Commission and provider resources.

Fortunately, as discussed in the sections that follow, there are three steps the Commission can take both to prevent the emergence of a “reverse rural call completion” problem and to protect rural consumers should their calls nonetheless be inadvertently blocked. These three measures are:

- (1) The adoption of basic “rules of the road” with respect to interconnection for the exchange of voice traffic between IP-enabled networks.
- (2) Commission action to encourage industry cooperation in alternative call authentication methods where needed due to the continued presence of TDM facilities.
- (3) A requirement that providers implement “guardrails” in connection with call blocking efforts, such as “intercept” messages to convey to blocked callers why their call may have been blocked and how they can remedy a “false positive,” as well as a rapid redress process to correct such mistakenly blocked calls. The Commission should also make clear that the lack of authentication for a call is not a basis, on its own, to block a call in the absence of further independent indicators that the call is not legitimate.

**B. A primary barrier to industrywide implementation of SHAKEN/STIR is the lack of basic “rules of the road” for IP interconnection for voice traffic. Commission action to address this issue would protect rural consumers from inadvertently being caught up in blocking tools as well as enable RLECs to protect their subscribers from unwanted or illegal robocalls.**

RLECs are eager for participation in call authentication efforts. Spoofers and other spam calls annoy, harass, and defraud rural consumers, and rapid adoption of call authentication technologies will be a valuable tool in attacking this problem.

As described above and in prior comments, even where a carrier is “all IP,” there are several barriers to implementation of SHAKEN/STIR that must be addressed if the promise of this framework will be realized across the nation. The most important step, however, that the Commission can take to ensure that the SHAKEN/STIR framework operates for the benefit of rural and urban consumers alike is to address the lack of basic “rules of the road” for IP interconnection for voice traffic.

It is important to understand that this concern with respect to IP interconnection is beyond the control of most RLECs. This is not a case of a widespread lingering presence of TDM facilities within RLEC networks causing delay or creating hurdles to nationwide implementation. Indeed, a recent survey indicated that 93 percent of NTCA members have IP-enabled switches within their networks, and thus (putting aside the expense associated with such implementation) many RLECs have the technical capability to implement SHAKEN/STIR within at least parts, if not all, of their networks.<sup>6</sup> Rather, even where IP-enabled within their own networks, NTCA members frequently report the continued presence and use of TDM facilities (such as tandem switches or interexchange carrier points of presence) within upstream provider networks – hindering the exchange of voice traffic in IP format and, of most relevance to the instant proceeding, precluding the transmittal of call authentication information necessary to authenticate calls under the SHAKEN/STIR framework.

That said, even where RLEC networks *and* those with whom such providers exchange voice traffic may *both* be IP-enabled, the absence of basic “rules of the road” that provide all parties a clear path and clear incentives to enter into IP interconnection agreements for the

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<sup>6</sup> Broadband/Internet Availability Survey Report, NTCA–The Rural Broadband Association, Dec. 2019, p. 9 available at: [https://www.ntca.org/sites/default/files/documents/2019-12/2019%20Broadband %20Survey %20Report.pdf](https://www.ntca.org/sites/default/files/documents/2019-12/2019%20Broadband%20Survey%20Report.pdf).

exchange of voice traffic represents the *primary barrier* to SHAKEN/STIR implementation for wide swaths of rural America. Today, RLECs typically exchange traffic either at their end office switches (in the case of direct trunking) or at agreed-upon meet points with other carriers. Putting aside any intercarrier compensation payment issues and focusing only on relative interconnection and transport responsibilities, RLECs serving small, rural customer bases are financially responsible for outbound voice calls only to the point of their originating switch or, at most, for transport of such calls to a meet-point boundary. Looking forward, in an IP-enabled world where there are no “rules of the road,” it is likely that these fundamental interconnection economics will be turned on their head – the vacuum created by the utter lack of “rules of the road” for what will happen once existing TDM interconnection arrangements are scrapped will give larger providers the incentive and ability to seek to shift all transport costs to these small carriers. Under such a scenario, the latter could be compelled to deliver calls to distant points of interconnection that may be several states and hundreds or even thousands of miles away from the rural areas where such calls originate. To the extent there is any doubt as to this outcome, prior filings found in the record advocate for precisely such a result – larger operators have loudly and repeatedly flagged to the Commission that this is the very objective of such a transition from their perspective.<sup>7</sup>

Should larger providers with whom RLECs exchange traffic leverage the IP transition to dictate such a shift in interconnection arrangements, the economics of interconnection for the exchange of voice traffic would be remade in a manner that puts universal service goals at risk.

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<sup>7</sup> See AT&T, *ex parte* letter, GN Docket No. 13-5, WC Docket No. 13-97, WC Docket No. 10-90 (fil. Jan. 24, 2014) (asserting that “IP interconnection will take place on a nationwide basis, and at a relatively small number of places”); Sprint, *ex parte* letter, WC Docket Nos. 10-90, 07-135, 05-337,03-109; CC Docket Nos. 01-92, 96-45; and GN Docket No. 09-51 (fil. Oct. 3, 2011) (arguing for “the more efficient regional interconnection arrangements typically used for non-voice IP traffic”).

Specifically, *for the first time ever, the costs of transport for voice traffic to and from isolated rural service areas would be foisted fully and solely onto small rural customer bases without any additional universal service support to cover such costs.* Indeed, for rural providers, these newly incurred costs of transporting every voice call to distant network edges could rapidly dwarf any other costs involved in SHAKEN/STIR implementation and thus undermine the affordability of voice service rates in rural America.

Fortunately, a narrow, simple, and straightforward fix exists to address this concern – a “hold harmless” provision for IP interconnection limited to agreements for the exchange of voice traffic between RLECs and other operators. More specifically, to promote the passing of call authentication information among IP-enabled networks wherever possible, the Commission should adopt a simple default rule that maintains existing interconnection points and transport responsibilities for voice calls between operators, regardless of whether a call is exchanged in TDM or IP. There is precedent for such a provision; such a rule could and should operate similar to the “rural transport rule” adopted in 2011.<sup>8</sup> That provision was enacted under circumstances similar to that which exist here: at that time, the Commission recognized that policy changes being enacted to address broader systemic issues (a move to bill and keep) risked shifting transport charges directly onto rural carriers and the customers they serve. The Commission then was concerned that its attempt to achieve its broader policy goal could have harmed a certain class of consumers and it took a rather narrow step necessary to ensure that this policy could move forward without unnecessary harm to rural consumers. Here, the impetus to promote rapid

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<sup>8</sup> *Connect America Fund*, WC Docket No. 10-90, et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“USF/ICC Transformation Order”), ¶¶ 998-999 (adopting a “rural transport rule” to ensure that the obligations of RLECs to carry originating non-access traffic do not extend beyond their service area boundaries, recognizing that absent such a rule, RLECs could be forced to incur unrecoverable transport costs).

implementation of SHAKEN/STIR both to protect rural consumers from spoofing and from having their unauthenticated calls blocked in error can, if proper care is not taken, harm rural consumers in much the same way by foisting upon them transport costs that have never been thrown atop them before.

**C. Industry collaboration – backed by Commission encouragement – to develop strategies for participation in call authentication efforts even where networks are not IP-enabled is necessary to ensure that all consumers can regain trust in the caller-ID system and to protect the reliability of voice communications.**

As noted above, the continued presence of TDM facilities – both within some RLEC networks and within the networks operated by the upstream carriers with which the former exchange voice traffic – remains a barrier to call authentication across all voice networks. Under the SHAKEN/STIR framework, call authentication information simply cannot be passed from originating to terminating carrier with any TDM in any call path. Carriers of all sizes will require significant time and resources to move beyond these TDM facilities as well as establish all IP interconnection agreements. Consumers seeking relief from an untrustworthy caller-ID system cannot – and should not – be forced to wait for relief.

The Commission should therefore seek comment on call authentication alternatives that could function with the continued presence of TDM facilities. The draft IETF “Out-of-Band” (“OOB”) STIR standard<sup>9</sup> is one alternative that has been the subject of numerous industry discussions and thus merits further discussion. To be clear, the discussion of OOB here should not be read as an outright endorsement of that technology or an indication that other alternatives, should they emerge, should not be considered as well. The point here is to emphasize the fact

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<sup>9</sup> STIR Out-of-Band Architecture and Use Cases, (Mar. 11, 2019) available at: <https://tools.ietf.org/html/draft-ietf-stir-oob-04>.

that the lingering presence of TDM facilities within some networks will require steps beyond SHAKEN/STIR to help remedy robocalling concerns for all consumers. Because consumers should not be forced to wait for protection from spoofers or forced to incur their unauthenticated calls being blocked simply because they happen to reside behind a TDM switch or be on a path with TDM interconnection arrangements between carriers, industry cooperation on an alternative standard is necessary and should be encouraged by the Commission.

**D. “Guardrails” around voice providers’ authority to block suspected unwanted or illegal robocalls are necessary to maintain the reliability of voice communications, particularly for rural consumers.**

NTCA supports the Commission’s clarification of voice providers’ authority to block suspected unwanted or illegal robocalls. Consumers in search of relief from these unwanted calls deserve access to any technology their provider can bring to the fight against these intrusions.

At the same time, consumers equally deserve a commitment by the Commission and all service providers to the continued reliability of the voice network. A party inadvertently caught up in a call-blocking service and placed on a “blacklist” (perhaps because their provider is unable to authenticate calls for the reasons discussed in Section II. B., *supra*) should have a means of correcting such a mistake as expeditiously as possible. Moreover, calling parties placing legitimate calls may not even know why a call failed and should not be forced to navigate a customer service bureaucracy to determine that the source of the failed call is an overzealous or improperly calibrated call blocking tool.

Such a concern is not merely speculative and indeed is highly likely to come to pass. The Commission has only recently granted voice providers broad latitude to block suspected illegal

or unwanted calls.<sup>10</sup> Mistakes will be made as these services are rolled out to greater numbers of consumers and refinements are made. Legitimate calls will almost certainly be blocked, and the Commission has a responsibility to consumers to plan ahead for this concern – and thus the *Call Blocking Report* at issue here should consider this potential scenario. Consumers caught up in mistaken blocking should not be “left to fend for themselves,” and the proposals set forth below would if adopted enable a rapid resolution to such a situation.

**1. Voice providers choosing to block calls must be required to deliver an “intercept message” to calling parties in the event a call is blocked.**

Calls blocked in error harm consumers and businesses on both sides of the call. Callers on the originating side (attempting to reach relatives, friends, or potential employees) may be unable to do so for reasons they do not understand. On the terminating side, millions of consumers will potentially never receive calls they may have wanted, because they never knew such calls were being blocked in error. It may only be via email or some other communications medium between the parties that they discover a problem has arisen.

Would-be callers should not be forced to conduct an investigation and pursue complicated resolution procedures to determine why calls have failed. In addition, neither the calling nor the called party should face delays in resolving the situation, as they are forced to navigate a customer service bureaucracy to determine the nature of the problem – many on both sides will likely not be aware that call blocking versus other technical problems within a provider’s network is the cause of the problem. Time will be wasted trying to “get to the bottom” of the problem.

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<sup>10</sup> See, fn. 4, *supra*.

Thus, the Commission should enable consumers to bypass much of this process and enable parties implicated by inadvertent blocking to quickly “zero in” on the problem. Specifically, the Commission should require voice providers that choose to block calls to deliver an “intercept message” to callers in the event a call is blocked. Such a message should convey to blocked callers that their call has been blocked as a suspected unwanted, spam, or illegal robocall. The message should further provide the calling party instructions on how to correct a “false positive” and remove their number from any “blacklist” on which it may have been placed.

**2. Voice providers choosing to block calls must adopt a process for rapid redress of “false positives” that inadvertently block legitimate or wanted calls.**

Even knowing why calls have failed – that calls have been blocked as a suspected unwanted or illegal robocall – is of limited value if a consumer inadvertently caught up as a “false positive” cannot remedy that erroneous designation. Consumers placed on a “blacklist” through no fault of their own and unable to make legitimate and wanted calls should not be stuck there in perpetuity. They should not be forced to file a complaint at the Commission – such is a “remedy” in name only as it could take months or even years to resolve. Nor should consumers be forced to turn to their voice provider to intercede on their behalf. Thus, voice providers that choose to *voluntarily* avail themselves of the authority granted by the Commission in June 2019 to use call blocking tools should be required to establish a process by which a party (or their provider if they so choose to offer such a service to their subscribers) can rapidly correct a false positive.

**3. The Commission should clearly state that calls cannot be blocked based on the lack of caller-ID authentication alone.**

Finally, the Commission should make clear that voice providers can under no circumstances block any call based solely upon the lack of caller-ID authentication. Blocking a call in the absence of additional factors beyond lack of authentication could quickly introduce the “reverse rural call completion” problem discussed above, to the potential detriment of millions of rural consumers.

Those that would oppose such a Commission policy misunderstand the very nature of call authentication. SHAKEN/STIR does not, on its own, identify unwanted or illegal robocalls. Rather, it indicates to the consumer, when implemented by an originating and terminating provider, that the caller-ID displayed has not been “spoofed.” Callers can trust that calls so authenticated did in fact come from the telephone number on the caller-ID display. Calls not authenticated, on the other hand, may be unwanted or illegal – or they could just as well be wanted and legal but unauthenticated nonetheless (especially if exemptions such as those contained in the TRACED Act are in place for certain classes of providers).<sup>11</sup> But a lack of authentication, standing alone, tells providers and consumers *nothing* about the nature of the call itself other than the accuracy of the caller-ID.

Where the value of SHAKEN/STIR will be realized in the context of potential call blocking is when the information conveyed to the terminating provider is paired with additional criteria. Whether a call is authenticated, as well as other data points, will inform call blocking technologies and further consider the nature of an unauthenticated call to determine whether it

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<sup>11</sup> Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105 (2019) (providing exemptions from call authentication mandates for certain classes of providers and granting the Commission the authority to delay compliance with such mandates for other classes of providers under certain conditions.).

should be blocked. Yet, because SHAKEN/STIR on its own *only confers information as to the accuracy of caller-ID and nothing else*, it does not tell a consumer or any analytics providers standing alone whether a call is or is not in fact an illegal or unwanted robocall.

A clearly stated Commission policy – that voice providers can under no circumstances block any call based solely upon the lack of caller-ID authentication – is therefore necessary and appropriate to ensure that call blocking technologies serve, rather than harm, the interests of consumers.

### **III. CONCLUSION**

For the reasons discussed above, the *Call Blocking Report* and its evaluation of call-blocking technologies must consider whether consumers are sufficiently protected from “false positives” that result in legitimate and wanted calls from being blocked. Commission action to ensure that RLECs can obtain reasonable IP interconnection to participate in the SHAKEN/STIR ecosystem and to promote industry consideration of alternative authentication methods where TDM facilities persist is necessary to protect rural consumers both from unwanted “spoofed” calls and an increased incidence of blocked calls. Moreover, “guardrails” around voice providers’ use of call-blocking tools are necessary to ensure consumers are well-informed about the use of call blocking technologies, to ensure that consumers can remedy quickly any concerns that may arise with respect to erroneously blocked calls, and to preclude voice providers from blocking calls based merely upon a lack of authenticated information without other contributing factors.

Respectfully submitted,

**NTCA–The Rural Broadband Association**

By: /s/ Michael R. Romano

Michael R. Romano

Senior Vice President –

Industry Affairs & Business Development

[mromano@ntca.org](mailto:mromano@ntca.org)

By: /s/ Brian J. Ford

Brian J. Ford

Director of Industry Affairs

[bford@ntca.org](mailto:bford@ntca.org)

4121 Wilson Boulevard, Suite 1000  
Arlington, VA 22203