



July 18, 2019

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**RE: Advanced Methods to Target and Eliminate Unlawful Robocalls
CG Docket No. 17-59**

**Call Authentication Trust Anchor
WC Docket No. 17-97**

**Developing a Unified Intercarrier Compensation Regime
CC Docket No. 01-92**

**Updating the Intercarrier Compensation Regime to Eliminate Access Arbitrage
WC Docket No. 18-155**

Dear Ms. Dortch:

On Tuesday, July 16, 2019, the undersigned and Brian Ford on behalf of NTCA–The Rural Broadband Association (“NTCA”),¹ as well as Denny Law, General Manager of Golden West Telecommunications in South Dakota, spoke with Nicholas Degani, Senior Counsel, and Nirali Patel, Wireline Advisor, to Federal Communications Commission (“Commission”) Chairman Ajit Pai. Mr. Law participated by telephone. The parties discussed issues related to how the Commission can facilitate RLECs’ full participation in the SHAKEN/STIR caller-ID “spoofing” mitigation framework.

NTCA and Mr. Law noted at the outset RLECs’ strong commitment to combatting the scourge of illegal caller-ID spoofing. These community-based providers are committed to putting a stop to bad actors that annoy and defraud rural and urban consumers alike and that have eroded trust in caller-ID.² In the spirit of turning this commitment to combatting spoofers into action

¹ NTCA represents approximately 850 independent, community-based telecommunications companies and cooperatives and more than 400 other firms that support or are themselves engaged in the provision of communications services in the most rural portions of America. All of NTCA’s service provider members are full service rural local exchange carriers (“RLECs”) and broadband providers, and many provide fixed and mobile wireless, video, satellite and other competitive services in rural America as well.

² It should also be noted that NTCA is a founding member of the Secure Telephone Identity Governance Authority (“STI-GA”) Board of Directors. The association has committed its time and financial resources to the

by participating in the SHAKEN/STIR framework, NTCA and Mr. Law discussed ways the Commission can assist and promote such participation on the part of RLECs. Removal of certain hurdles, if done properly and in an expedited manner by the Commission, would streamline the availability of this valuable technology for millions of rural consumers.

Before turning to the larger issue at hand, NTCA and Mr. Law discussed two initial prerequisites to the implementation of SHAKEN/STIR. First, we discussed how SHAKEN/STIR is not compatible with TDM switching facilities. While it is our understanding that the vast majority of NTCA members have moved to IP switching facilities, those that have not will face additional, potentially substantial costs. The Commission will need to consider how to address and assist those smaller carriers facing such circumstances in making this transition.

The second prerequisite we discussed was the need for more specific development of SHAKEN/STIR capabilities within IP-enabled switching platforms even once they are deployed. We noted that the vendor community – a key part of SHAKEN/STIR implementation – is still in the process of developing and bringing to market at affordable rates solutions that the small operator community can utilize. Even once such solutions emerge, initial estimates suggest significant upfront and ongoing annual financial outlays for rural operators with respect to implementing SHAKEN/STIR in the absence of further changes in that marketplace. For many smaller providers, the financial outlays necessary to participate in the framework may be difficult to bear and recover from small rural customer bases.

NTCA and Mr. Law then made clear, however, that an even larger systemic concern than these two hurdles is how smaller rural carriers will be able to interconnect with other voice providers for the passage and exchange of SHAKEN/STIR certificates absent further Commission action. These interconnection issues arise because, just as switching must be IP-enabled, SHAKEN/STIR requires that a call be handed off in IP format for certificates to transfer. Yet, as of today, there are no rules to govern the exchange of such traffic. Absent clear “rules of the road” that establish reasonable network edges comparable to those in place today, rural operators in need of IP interconnection agreements to implement SHAKEN/STIR could find themselves at the mercy of larger providers dictating new interconnection and transport terms. As a result, these larger providers could quite easily shift to these small carriers the costs of transporting voice calls between rural operators’ local network edges and distant points of interconnection – fundamentally remaking the economics of interconnection and foisting the costs of transport fully onto small rural customer bases. As this would be required for all voice calls, these costs could rapidly dwarf the other costs involved in SHAKEN/STIR implementation as noted above and could thus undermine universal service and the affordability of voice service rates in rural America.

We therefore indicated that, if the Commission wishes to see STIR/SHAKEN solutions implemented in rural America, it would need to adopt something analogous to the “rural transport rule” that it has previously utilized where policy changes risked shifting transport

creation of the STI-GA because of its commitment and that of its members to combat the scourge of caller-ID “spoofing” used to defraud or annoy consumers.

charges upon small carriers and the rural customers they serve.³ Given the clear precedent for such a rule and the compelling need to promote solutions to combat the scourge of robocalling, we observed that adoption of such a rule – which would do nothing more than preserve interconnection responsibilities as they stand today – would be at once advisable and essential.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS.

Sincerely,
/s/ Michael Romano
Michael Romano
Senior Vice President – Industry Affairs and
Business Development
NTCA-The Rural Broadband Association

cc: Nicholas Degani
Nirali Patel

³ *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 at a time when intercarrier compensation reforms could have a negative impact on network cost recovery).