



October 15, 2021

***Ex Parte* Notice**

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C., 20554

RE: Call Authentication Trust Anchor, WC Docket No. 17-97

Dear Ms. Dortch:

On Friday, October 15, 2021, the undersigned and Brian Ford on behalf of NTCA–The Rural Broadband Association (“NTCA”)¹ met with Daniel Kahn, Wireline Competition Bureau (“WCB”) Associate Bureau Chief; Pamela Arluk, Chief of the WCB’s Competition Policy Division (“CPD”); Matt Collins, Assistant Chief of the CPD; and Jonathan Lechter with the CPD. The parties discussed the Third Further Notice of Proposed Rulemaking (“*Third Further Notice*”)² released by the Federal Communications Commission (the “Commission”) in the above-referenced TRACED Act³ proceeding. The *Third Further Notice* sought comment on how to identify the “small” (fewer than 100,000 access lines) voice providers that are likely to be the source of “especially large amounts of robocalls” and the possibility of amending, to an earlier date, the June 2023 deadline by which such operators must implement STIR/SHAKEN call authentication technology.⁴

Consistent with previous advocacy, NTCA reiterated its support for Commission attention towards voice providers that enable parties using voice service to generate unwanted, illegal or “spoofed” robocalls, even as we continue to express concern that certain methods to identify such bad actors as proposed in the *Third Further Notice* would be overinclusive. *See*, Ex Parte Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 17-97 (fil. Oct. 5, 2021). The discussion then turned to proposals in the record that would seek to identify more narrowly those providers that should be required to adopt STIR/SHAKEN on an earlier timeline. As NTCA has previously noted, facilities-based providers are entities that offer far more than the mere provision of the ability to originate voice calls and at high volumes – rather, these are typically entities that have built networks and facilities designed to offer a host of voice and non-voice services. These entities have both a local presence in the

¹ NTCA represents approximately 850 providers of high-quality voice and broadband services in the most rural parts of the United States. In addition to voice and broadband, many NTCA members provide wireless, video, and other advanced services in their communities.

² *Call Authentication Trust Anchor*, WC Docket No. 17-97, Third Further Notice of Proposed Rulemaking, FCC 21-62 (rel. May 21, 2021) (“*Third Further Notice*”).

³ Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, § 4(b)(1)(A), 133 Stat. 3274, 3277 (2019) (“TRACED Act”).

⁴ *Third Further Notice*, ¶ 1.

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communities they serve (in terms of physical network assets) and serve customers with a physical presence as well. The risk of illegal robocalls being generated by such providers serving “actual customers over actual networks” in these communities would therefore appear relatively low. For those “bad actors” that the Commission determines are not facilities-based, and are thus more likely to be the sources of large amounts of such robocalls as the record demonstrates, the Commission should accelerate the compliance timeframe to implement STIR/SHAKEN call authentication technology.

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: Daniel Kahn
Pamela Arluk
Matt Collins
Jonathan Lechter