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The SIP School
Learn and Qualify

Robocall Mitigation Filing Essentials

April 29, 2021

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Presenters

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The SIP School – Promo Code TN10

The Problem!
Caller ID Spoofing
STIR/SHAKEN and what it promises
PASSporTs and the Identity Header
the STIR/SHAKEN Architecture
Certificate Management
Attestation levels
Verstat or Verification Status
Authentication and
Enterprises and getting an 'A'

Delegate Certificates and other solutions
Rich Call Data
International STIR/SHAKEN
Out of Band STIR/SHAKEN
Call Diversion

Scams and illegal Robocalls	STIR/SHAKEN
It will reach you at some point!	Standards Standards Standards

Call Analytics
The June 30th deadline!
The Law
Robocall Mitigation plans
Traceback and the Industry Traceback Group

www.thesipschool.com

About TransNexus

- Serving Voice Providers since 1997
- Least Cost Routing, Toll Fraud Control, TDoS and Robocall Prevention
- SHAKEN and Robocall Mitigation
  - 2017 Aug Second company to pass the ATIS SHAKEN test bed
  - 2019 May Implemented SHAKEN in Production
  - 2019 Dec First certified SHAKEN Certificate Authority
  - 2020 Jan Authorized SHAKEN vendor by Policy Administrator
- Active Contributor to ATIS SHAKEN Standards

Agenda

1. Overview of FCC regulations
2. Public Notice - April 20, 2021
3. Implementing a Robocall Mitigation Program
4. Implementing SHAKEN
5. How to meet the FCC June 30th deadline
6. Questions and Answers

Overview of FCC Regulatio

The TRACED Act brought profound changes in telecom regulation

- Dec 2019 Congress passed the TRACED Act
  - Voice providers must implement call authentication by June 30, 2021
- Mar 2020 - 1st order mandates STIR and SHAKEN for IP networks[1]
- Sep 2020 - 2nd order
  - Rules apply to anyone who provides voice service to an end user[2]
  - TDM service providers must implement Robocall Mitigation[3]
  - Service providers with <100,000 lines have Robocall Mitigation or SHAKEN option[4]
  - New FCC database for SHAKEN/Robocall Mitigation certification[5]
- Dec 2020 - 4th order To eliminate Robocalls
  - "Service providers must police their networks"[6] – SHAKEN alone is not enough

Common Misunderstandings

- The Traced Act does not apply to me.
  - Applies to anyone who provides voice service to end users
- I am already blocking inbound calls, so I am good.
  - FCC requirements for SHAKEN and Robocall Mitigation apply to outbound calls.
- I have a two year extension, the June 30th deadline does not apply.
  - Every service provider must certify by June 30th 2021
- I have a two year extension, I am good for now
  - Service Providers with an extension must implement robocall mitigation by June 30th 2021

The FCC is serious about enforcement

Communications Daily

The authoritative news source for communications regulation

FCC Sends 2 Companies Cease-and-Desist Letters for Transmitting Illegal Robocall Traffic

WIRELINE | **14 Apr 2021** | Ref: 2104130040

The FCC issued cease-and-desist letters Tuesday to R Squared and Tellza for "apparently transmitting illegal robocall traffic." The companies appeared to have transmitted "multiple unlawful robocall campaigns that market auto warranties and credit card debt reduction service, or claim, falsely,...

Updated Mar 17, 2021, 04:29pm EDT

The Public Notice April 20, 2012

1. Certification must be submitted to the FCC database by June 30th [1]

   Choose one

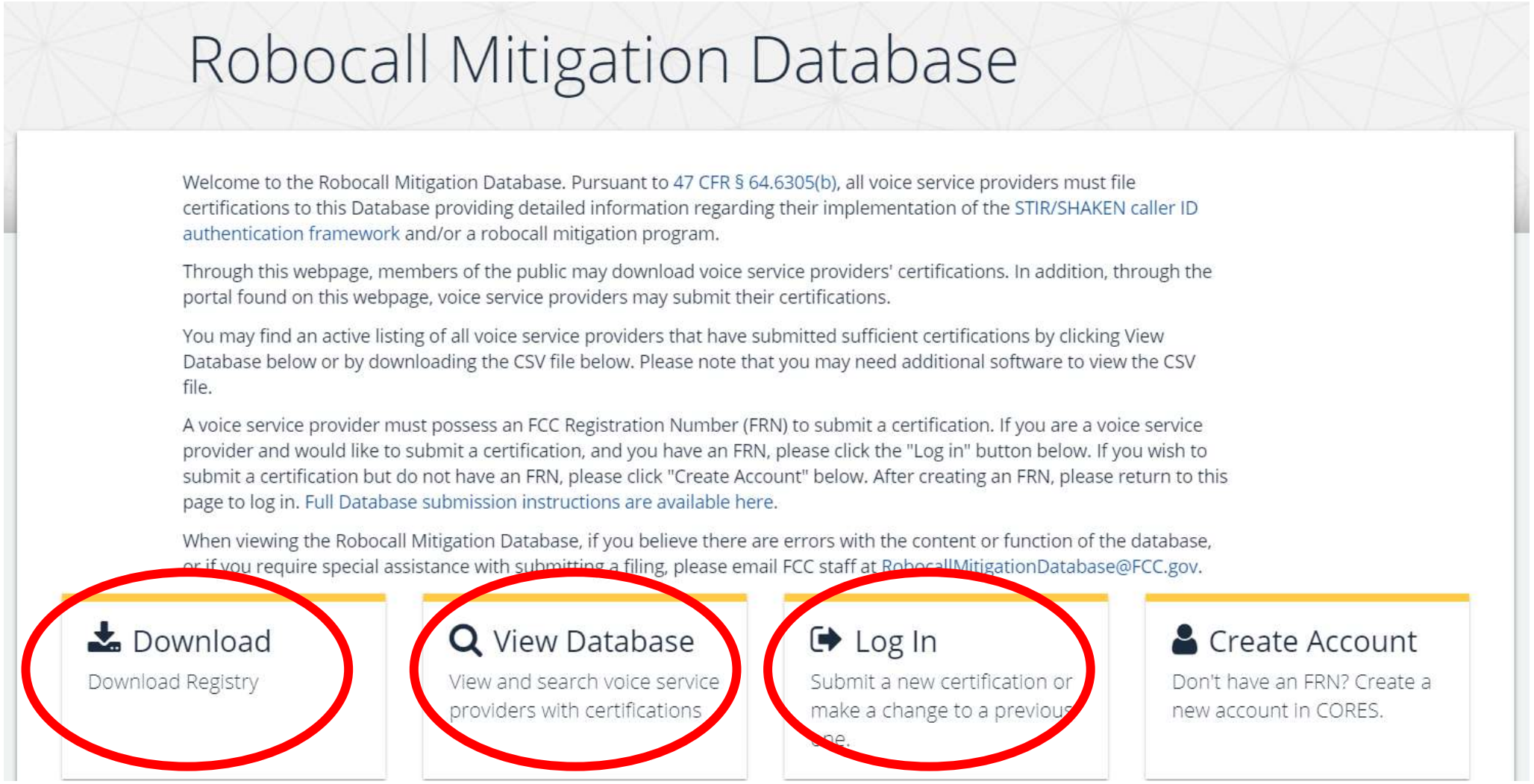
   ❑Option 1: Complete STIR/SHAKEN Implementation

   ❑ Option 2: Partial STIR/SHAKEN Implementation – Performing Robocall Mitigation

   ❑ Option 3: No STIR/SHAKEN Implementation – Performing Robocall Mitigation

2. On September 28th, service providers **must block** all calls from service providers that are not in the FCC database.[2]

Welcome to the FCC Database



Robocall Mitigation Program

- No instructions from the FCC
- It must work.
  - "includes detailed practices that can reasonably be expected to significantly reduce the origination of illegal robocalls."[1]
- It must be implemented.
  - "the voice service provider must comply with the practices it describes"[2]
- Cooperate with the USTelecom Traceback Group

A note of caution from the FCC

if any voice service provider submits a certification that is found to be deficient in some manner, it will be subject to appropriate enforcement action, which may include the removal of its defective certification from the database

Second STIR/SHAKEN Order pages 45-46, para. 83

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Attributes of a good RM program

- Prevents Traceback Requests
  - Proactive
  - Detailed reporting and analysis
  - Avoid being in the annual report to Congress
- Simple to understand, Easy to operate
- Adds value for your subscribers
  - Identify subscribers who are victims of identity theft by number spoofing

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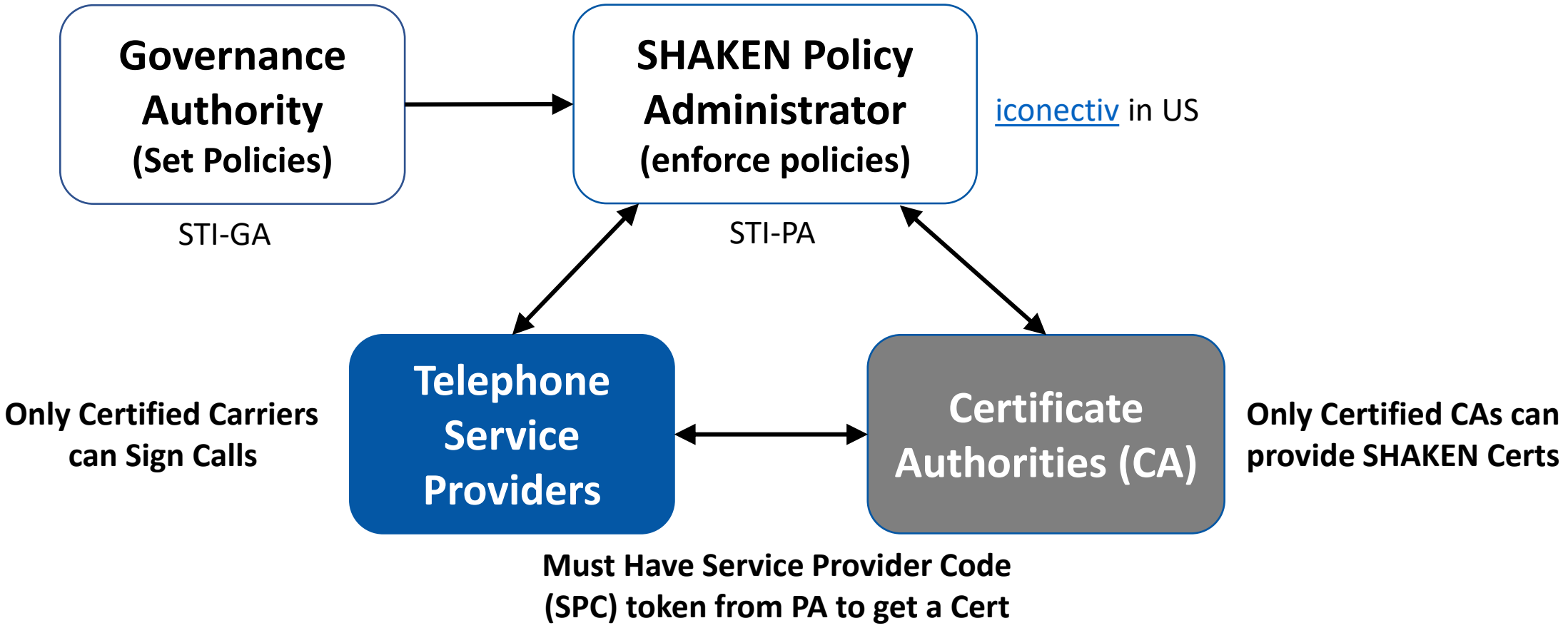
Implementing SHAKEN

- Register with the Policy Administrator
- Integrate SHAKEN into your network
- Attestation policies

Register with the Policy Administrator



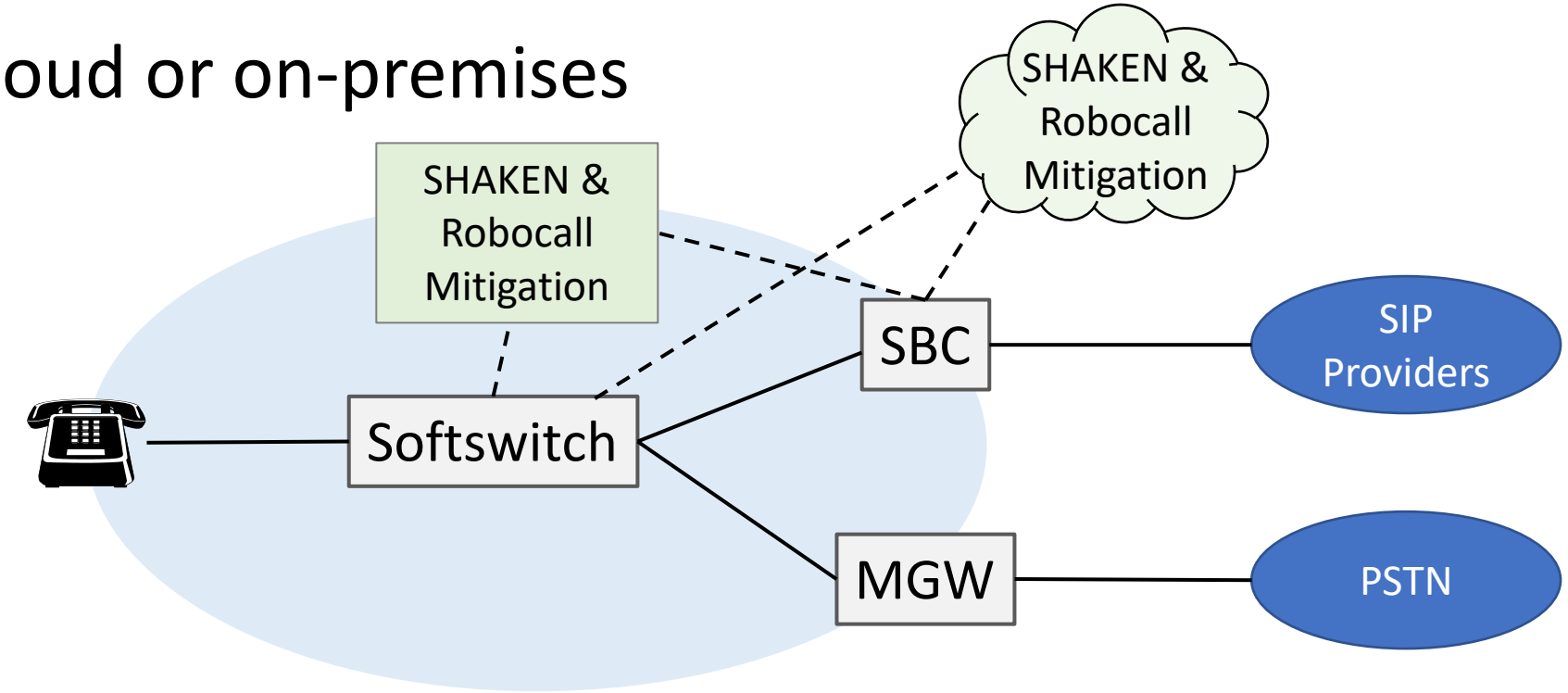
Register with the Policy Administrator

- Register on the Policy Administrator (PA) website
- Follow the Service Provider Guidelines
- Requirements to Register

Now	June 30, 2021
Form FCC 499 on file (Universal Service Fund)	Form FCC 499 on file
Operating Company Number (How to get an OCN) - Not a telephone company? - Get an IP Enabled Service (IPES) OCN	Operating Company Number
Access to Telephone Numbers - Not a telephone company? - File with FCC to become an Interconnected VoIP Provider	SHAKEN certification in FCC database

Integrate SHAKEN into your network

- Centralized deployment or at the network edge
- SIP and HTTP SHAKEN interfaces
- Cloud or on-premises



How to set attestation values

- SHAKEN Attestation indicates level of trust
- A = trusted relationship with the calling number and its user
  - Calling number is assigned in the switch
  - Letter of Authorization from the user
- B = trusted relationship with the customer
  - Call from a end user trunk group
- C = no trust
- Defined in ATIS-1000074 section 5.2.3

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Preparing for the June 30th deadline

- If more than 100,000 lines: Must implement
  - SHAKEN for SIP
  - Robocall Mitigation for TDM
- If less than 100,000 lines – you have an option
  - Robocall Mitigation or SHAKEN for SIP
  - Robocall Mitigation for TDM
- Most common path forward for small providers
  - Implement Robocall Mitigation to meet June 30th deadline
  - Start transition to SHAKEN

Easy

Best Value

TransNexus Solutions

- Robocall Mitigation and SHAKEN combined for SIP and TDM
- SIP or HTTP SHAKEN integration
- Robocall Mitigation for non-US operators
- Robocall Mitigation Plan template ready to file with the FCC

"Our partnership with TransNexus has enabled Brightlink to be one of the first service providers to implement SHAKEN (Feb 2020) and one of the first in the FCC database."

Scott Allen
COO

Question and Answers

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