



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

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Internet: <https://www.fcc.gov>
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WIRELINE COMPETITION BUREAU SEEKS COMMENT ON REQUESTS FOR EXTENSION OF STIR/SHAKEN DEADLINE AND ON VERIZON PETITION FOR DECLARATORY RULING

WC Docket No. 17-97

Comment Date: January 4, 2021

Reply Comment Date: January 19, 2021

The Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act and section 64.6301(a)(3) of the Commission's rules require voice service providers to fully implement the STIR/SHAKEN caller ID authentication framework in the Internet Protocol (IP) portions of their networks by June 30, 2021.¹ The Commission granted certain categories of voice service providers an extension from this implementation deadline,² and it established a process whereby voice service providers may file individual petitions for an extension on the basis of undue hardship.³ Those portions of a voice service provider's network that rely on non-IP technology are deemed subject to a continuing extension but providers must work to develop a non-IP solution or upgrade their networks to support the STIR/SHAKEN framework.⁴

The Wireline Competition Bureau hereby seeks comment on four timely-filed extension requests and on a related petition for declaratory ruling filed by Verizon:

- AT&T seeks a one-year extension for “two discrete gaps” in its IP network that it has recently identified as unable to support STIR/SHAKEN.⁵
- Lumen seeks a six-month extension for its entire IP network “to accommodate the potential for specific equipment-related delays.”⁶

¹ Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105 (2019) (TRACED Act) § 4(b)(1)(A); 47 CFR § 64.6301(a)(3).

² TRACED Act §§ 4(b)(5)(A)(ii), 4(b)(5)(B); *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, FCC 20-136, at 18, para. 38 (Oct. 1, 2020) (*Second Caller ID Authentication Report and Order*).

³ *Id.* at 34, para. 65.

⁴ 47 CFR §§ 64.6301(a), 64.6303(d); *Second Caller ID Authentication Report and Order*, at 35, para. 66.

⁵ Petition of AT&T Services, Inc., for Extension of Implementation Deadline, WC Docket No. 17-97, at 3 (filed Nov. 23, 2020), <https://ecfsapi.fcc.gov/file/112141280138/11.20.2020%20Extension%20Request%20FINAL.pdf>.

- U.S. Cellular seeks an extension for both its IP and non-IP networks. For its IP networks, U.S. Cellular requests an extension regarding traffic for which it has not yet “complete[d] interconnection with other carriers with which it has an SIP interconnection agreement . . . until such time that such interconnection is completed.”⁷ For its non-IP networks, U.S. Cellular requests an extension until it can complete migration of non-IP customers to its STIR/SHAKEN-enabled IP network.⁸
- Verizon seeks a declaratory ruling that a “specific and limited” portion of its Plain Old Telephone Service network “falls outside the scope of the TRACED Act’s STIR/SHAKEN implementation mandate.”⁹ Verizon alternatively seeks a three-year extension to implement STIR/SHAKEN on that portion of its network.¹⁰

Filing Requirements. Pursuant to sections 1.415 and 1.419 of the Commission’s rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission’s Electronic Comment Filing System (ECFS). See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <http://apps.fcc.gov/ecfs/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
- Filings can be sent by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission’s Secretary, Office of the Secretary, Federal Communications Commission.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701. U.S. Postal Service first-class, Express, and Priority mail must be addressed to 45 L Street NE, Washington, DC 20554.

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⁶ Request of Lumen for Extension, WC Docket No. 17-97, at 1 (filed Nov. 23, 2020), <https://ecfsapi.fcc.gov/file/112012406154/201120%20Lumen%20extension%20request%20WC17-97.pdf>.

⁷ Motion of United States Cellular Corporation for Extension of Time, WC Docket No. 17-97, at 3 (filed Nov. 23, 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>.

⁸ *Id.* at 3.

⁹ 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 (filed Nov. 23, 2020), <https://ecfsapi.fcc.gov/file/11201014508317/2020%2011%2020%20Verizon%20Petition.pdf>.

¹⁰ *Id.* at 3.

- Effective March 19, 2020, and until further notice, the Commission no longer accepts any hand or messenger delivered filings. This is a temporary measure taken to help protect the health and safety of individuals, and to mitigate the transmission of COVID-19. See FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy, Public Notice, DA 20-304 (March 19, 2020). <https://www.fcc.gov/document/fcc-closes-headquarters-open-window-and-changes-hand-delivery-policy>.

Ex Parte Rules. This proceeding is considered a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules.¹¹ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter’s written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (*e.g.*, .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission’s *ex parte* rules.

People with Disabilities. To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (TTY).

Additional Information. For further information, please contact Alexander Hobbs, Attorney Advisor, Competition Policy Division, Wireline Competition Bureau at (202) 418-7433 or by email at alexander.hobbs@fcc.gov

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¹¹ 47 CFR §§ 1.1200 *et seq.*