



PUBLIC NOTICE

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WIRELINE COMPETITION BUREAU PERFORMS REQUIRED EVALUATION OF STIR/SHAKEN IMPLEMENTATION EXTENSIONS PURSUANT TO SECTION 64.6304(F) OF THE COMMISSION'S RULES

WC Docket No. 17-97

In this Public Notice, the Wireline Competition Bureau (Bureau) performs its annual reevaluation of the remaining STIR/SHAKEN implementation extensions granted by the Federal Communications Commission (Commission or FCC) for undue hardship, in accordance with section 4(b)(5)(F) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act and as required by section 64.6304(f) of the Commission's rules.¹ Only two such extensions remain—an extension for providers² that cannot obtain the Service Provider Code (SPC) token necessary to participate in the STIR/SHAKEN framework due to the policy for obtaining a token and an extension for small voice service providers that originate calls via satellite using North American Numbering Plan (NANP) numbers.³ We find that these extensions remain necessary at this time to avoid potential undue hardship and that retaining the extensions does not present a significant barrier to the Commission's goal of full participation in the STIR/SHAKEN framework.

I. BACKGROUND

In the TRACED Act, Congress directed the Commission to require voice service providers to implement the STIR/SHAKEN authentication framework in the Internet protocol (IP) portions of their network not later than June 30, 2021.⁴ The TRACED Act also gave the Commission an initial and ongoing responsibility to “assess any burdens or barriers” to the implementation of STIR/SHAKEN that certain providers might face and “upon a public finding of undue hardship,” authorized the Commission to delay STIR/SHAKEN implementation “for a reasonable period of time.”⁵ In its initial assessment

¹ Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, § 4(b)(5)(F), 133 Stat. 3274, 3279 (2019) (codified in 47 U.S.C. § 227b) (TRACED Act); 47 U.S.C. § 227b(b)(5)(F); 47 CFR § 64.6304(f) (delegating authority to the Bureau to conduct the annual reevaluation of undue hardship extensions); *see also Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1896-97, paras. 71-73 (2020) (*Second Caller ID Authentication Report and Order*). STIR/SHAKEN refers to the Secure Telephone Identity Revisited and Signature-based Handling of Asserted information using toKENs framework, which is a set of technical standards and protocols for IP networks that allow authenticated call information to travel with calls, thereby enabling providers to identify illegally spoofed caller ID information before those calls reach their subscribers and enhancing the ability of law enforcement to find and stop bad actors.

² Unless otherwise stated, the term “provider” in this Public Notice refers to voice service providers, gateway providers, and non-gateway intermediate providers. *See* 47 CFR § 64.6300(d), (i), (o).

³ 47 CFR § 64.6300(a)(1)(iii), (b).

⁴ TRACED Act § 4(b)(1)(A); 47 U.S.C. § 227b(b)(1)(A); *see also* 47 CFR § 64.6301(a).

⁵ TRACED Act § 4(b)(5)(A); 47 U.S.C. § 227b(b)(5)(A).

conducted in 2020, the Commission granted three categorical implementation extensions based on undue hardship.⁶ The Commission added another categorical undue hardship extension in 2023.⁷ Only two categorical undue hardship extensions remain: (1) for providers that cannot obtain the SPC token necessary to participate in STIR/SHAKEN due to the policy for obtaining a token, and (2) for small voice service providers that originate calls via satellite using NANP numbers.⁸ A provider that asserts it does not have an obligation to implement STIR/SHAKEN because it qualifies for an extension “must both explicitly state the rule that exempts it from compliance and explain in detail why that exemption applies” in its Robocall Mitigation Database (RMD) filing.⁹

The TRACED Act further directed the Commission to, “not less frequently than annually after the first [extension] is granted,” “consider revising or extending” any extension granted due to undue hardship.¹⁰ For its assessment of any previously-granted extension, the Commission must issue a public notice addressing “why such [extension] remains necessary” and “when the Commission expects to achieve the goal of full participation” in caller ID authentication.¹¹ To comply with these obligations, the Commission’s rules direct the Bureau to “annually review the scope” of all STIR/SHAKEN

⁶ See *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1877-83, paras. 39-51 (granting (1) an extension for small voice service providers with 100,000 or fewer voice subscriber lines until June 30, 2023; (2) a continuing extension for providers unable to obtain the SPC token necessary to participate in STIR/SHAKEN due to the policy for obtaining a token; and (3) an extension for services scheduled for section 214 discontinuance until June 30, 2022). The Commission thereafter shortened to June 30, 2022, the extension for non-facilities-based small voice service providers, which it found were likely to be the source of illegal robocalls, while maintaining the June 30, 2023, extension for facilities-based small voice service providers. See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Fourth Report and Order, 36 FCC Rcd 17840, 17844, para. 9 (2021) (*Fourth Caller ID Authentication Report and Order*); 47 CFR § 64.6304(a)(1). As part of its initial assessment, the Commission also established a rule allowing providers to petition by November 20, 2020, for a provider-specific extension based on undue hardship. See *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1892. Two providers petitioned for this extension but were both denied. See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Order, 36 FCC Rcd 6550 (2021). Providers also have a continuing extension for the portions of their networks that rely on technology that cannot initiate, maintain, or terminate session initiation protocol (SIP) calls, but this extension is required by section 4(b)(5)(B) of the TRACED Act rather than granted by the Commission on the basis of undue hardship pursuant to section 4(b)(5)(F), and it is therefore not subject to the annual extension evaluation. See TRACED Act § 4(b)(5)(B); 47 U.S.C. § 227b(b)(5)(B); 47 CFR § 64.6304(d); *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1884-85, 1892-96, paras. 52-53, 66-70. Additionally, providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN are exempt from implementing STIR/SHAKEN, but this is not an undue hardship extension and thus is not subject to the annual extension evaluation. See *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, 3260, para. 40 (2020) (*First Caller ID Authentication Report and Order*).

⁷ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573, 2614-15, paras. 79-82 (2023) (*Sixth Caller ID Authentication Order and Further Notice*) (granting an extension to small voice service providers that originate calls via satellite using NANP numbers); 47 CFR § 64.6304(a)(1)(iii).

⁸ See 47 CFR § 64.6304; *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1877-82, 1883, paras. 40-48, 51; *Fourth Caller ID Authentication Report and Order*, 36 FCC Rcd at 17840-41, 17844, paras. 1, 9.

⁹ *Sixth Caller ID Authentication Report Order and Further Notice*, 38 FCC Rcd at 2596-97, para. 45 (footnotes omitted); see also *id.* at para. 45 n.171 (noting that a provider must, for example, explain the steps it has taken to diligently pursue obtaining an SPC token); 47 CFR § 64.6305(d)(2)(i) (explaining that voice service providers must identify the type of extension it has and the basis for the extension); 47 CFR § 64.6305(e)(2)(i) (same for gateway providers); 47 CFR § 64.6305(f)(2)(i) (same for non-gateway intermediate providers).

¹⁰ See TRACED Act § 4(b)(5)(F); 47 U.S.C. § 227b(b)(5)(F).

¹¹ TRACED Act § 4(b)(5)(F)(iii); 47 U.S.C. § 227b(b)(5)(F)(iii).

implementation extensions previously granted by the Commission on the basis of undue hardship.¹² The Commission specified that the Bureau is permitted to “decrease, but not to expand, the scope of entities that are entitled to a class-based extension,” and that it may lengthen, but cannot terminate an extension prior to its set end date.¹³

On August 27, 2025, the Bureau released a Public Notice seeking comment to inform this annual reevaluation of the remaining undue hardship STIR/SHAKEN implementation extensions.¹⁴

II. DISCUSSION

We conclude that the extensions for providers that cannot obtain the SPC token necessary to participate in the STIR/SHAKEN framework due to the policy for obtaining a token and for small voice service providers that originate calls via satellite using NANP numbers remain necessary without modification at this time to prevent potential undue hardship. While we find these extensions remain necessary at this time, the record and Bureau staff analysis demonstrate that the extensions are limited in scope and do not create a significant barrier to achieving ubiquitous STIR/SHAKEN implementation. The Bureau will continue to evaluate whether these extensions remain necessary so that full participation in the STIR/SHAKEN framework is achieved as soon as feasible.

A. Extension for Providers That Cannot Obtain an SPC Token

The Bureau finds that the extension for providers that are incapable of obtaining an SPC token due to the Token Access Policy remains necessary without modification while Bureau staff conducts additional assessment on whether the extension is ripe for repeal.

To participate in the STIR/SHAKEN framework, a provider must obtain an SPC token issued by the STIR/SHAKEN Policy Administrator, in accordance with the Token Access Policy established by the STIR/SHAKEN Governance Authority.¹⁵ Because access to a token is necessary for participation in the STIR/SHAKEN framework, the Commission’s September 2020 *Second Caller ID Authentication Report and Order* granted providers incapable of obtaining a token due to the Token Access Policy a continuing extension until they are capable of obtaining a token.¹⁶ Effective in May 2021, a revised Governance Authority Token Access Policy enabled token access by providers that were previously unable to obtain a token under the policy.¹⁷

¹² 47 CFR § 64.6304(f); see *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1896, para. 71; TRACED Act § 4(b)(5)(F); 47 U.S.C. § 227b(b)(5)(F).

¹³ *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1896, para. 72.

¹⁴ *Wireline Competition Bureau Seeks Comment on Two Periodic TRACED Act Obligations Regarding STIR/SHAKEN Caller ID Authentication*, WC Docket No. 17-97, Public Notice, DA 25-763 (WCB Aug. 27, 2025).

¹⁵ *Call Authentication Trust Anchor, Appeals of the STIR/SHAKEN Governance Authority Token Revocation Decisions*, WC Docket Nos. 17-97 and 21-291, Third Report and Order, 36 FCC Rcd 12878, 12879-81, paras. 4-6 (2021) (*Third Caller ID Authentication Report and Order*) (explaining the STIR/SHAKEN governance system and policy for obtaining SPC tokens); *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1864, para. 11 & n.37 (explaining that the Governance Authority establishes the policies implemented by the Policy Administrator); see also Secure Telephone Identity Governance Authority, Policy Decision Binder Version 9.0, Policy Decision 001: SPC Token Access Policy Version 1.2 (May 18, 2021), <https://cdn.atiss.org/stiga.atiss.org/2024/05/03194346/210518-Policy-001-SPC-token-Access-v1-2-FINAL.pdf> (Token Access Policy Version 1.2).

¹⁶ *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1882-83, para. 50; see also 47 CFR § 64.6304(b).

¹⁷ The Governance Authority removed a requirement that a provider have “direct access to telephone numbers from the North American Number Plan Administrator (NANPA) . . . and National Pooling Administrator (NPA)” and replaced it with a requirement that a provider be listed in the RMD. *Caller ID Authentication Governance*

In its first three annual reevaluations, the Bureau concluded that the revised Token Access Policy resolved the main practical concerns underlying the extension, and found that token access no longer stood as a significant barrier to full participation in the STIR/SHAKEN framework.¹⁸ Nevertheless, the Bureau concluded it was necessary to retain the extension in the event there are still providers that are unable to obtain an SPC token, and therefore cannot participate in the STIR/SHAKEN framework.¹⁹

In the March 2023 *Sixth Caller ID Authentication Further Notice*, the Commission sought comment on whether to eliminate the STIR/SHAKEN implementation extension for providers that cannot obtain an SPC token.²⁰ Based on the record developed in response to the *Sixth Caller ID Authentication Further Notice*, the Commission adopted its November 2024 *Eighth Caller ID Authentication Report and Order*, in which it declined at that time to modify the extension for providers that cannot obtain an SPC token.²¹ It observed that the Bureau was still reviewing submissions in the RMD in which providers have claimed they qualify for the SPC token extension.²² This review, the Commission explained, would allow the Bureau to “determine the number of providers still relying on the SPC token extension and the merit of the justifications submitted by those claiming the extension.”²³ The Commission concluded it would

Framework Revised to Enable Earlier Participation by Providers Without Direct Access to Telephone Numbers, WC Docket Nos. 13-97, 17-97, Public Notice, 36 FCC Rcd 8318, 8318-19 (WCB 2021). The current Token Access Policy requires providers to: (1) have a current form 499-A on file with the FCC; (2) have been assigned an Operating Company Number (OCN); and (3) have certified with the FCC that they have implemented STIR/SHAKEN or comply with the Commission’s robocall mitigation program requirements and are listed in the RMD, or have direct access to telephone numbers from the Toll-Free Number Administrator (TFNA). See Token Access Policy Version 1.2.

¹⁸ See *Wireline Competition Bureau Reevaluates STIR/SHAKEN Extensions Pursuant to Section 4(b)(5) of the TRACED Act*, WC Docket No. 17-97, Public Notice, 36 FCC Rcd 17748, 17751 (WCB 2021) (*First Reevaluation of STIR/SHAKEN Extensions Public Notice*); *Wireline Competition Bureau Performs Required Evaluation Pursuant to Section 64.6304(f) of the Commission’s Rules*, WC Docket No. 17-97, Public Notice, 37 FCC Rcd 14876, 14881 (WCB 2022) (*Second Reevaluation of STIR/SHAKEN Extensions Public Notice*); *Wireline Competition Bureau Performs Required Evaluation Pursuant to Section 64.6304(f) of the Commission’s Rules*, WC Docket No. 17-97, Public Notice, 38 FCC Rcd 11912, 11916-17 (WCB 2023) (*Third Reevaluation of STIR/SHAKEN Extensions Public Notice*).

¹⁹ *First Reevaluation of STIR/SHAKEN Extensions Public Notice*, 36 FCC Rcd at 17751; *Second Reevaluation of STIR/SHAKEN Extensions Public Notice*, 37 FCC Rcd at 14881 (noting that “there may still be entities meeting the definition of a provider of ‘voice service’ that are unable to obtain a token, and thus unable to comply with the STIR/SHAKEN rules”); *Third Reevaluation of STIR/SHAKEN Extensions Public Notice*, 38 FCC Rcd at 11916-17.

²⁰ *Sixth Caller ID Authentication Report Order and Further Notice*, 38 FCC Rcd at 2623, paras. 107-108. The Commission also sought comment on, *inter alia*, whether it should explicitly authorize use of third party caller ID authentication solutions, and if so, whether it should require third parties to sign calls using the provider’s SPC token. *Id.* at 2622, para. 103.

²¹ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Eighth Report and Order, 39 FCC Rcd 12894, 12915-16, para. 29 n.137 (2024) (*Eighth Caller ID Authentication Report and Order*). In this *Order*, the Commission authorized providers with a STIR/SHAKEN implementation obligation to “engage third parties to perform the technological act of signing calls” so long as (1) the provider with the implementation obligation makes all attestation-level decisions, consistent with the requirements of the technical standards; and (2) all calls are signed using the certificate of the provider with the implementation obligation. *Id.* at 12908-09, para. 20. The Commission also explicitly required all providers with a STIR/SHAKEN implementation obligation to obtain their own SPC token, which is necessary to obtain their own certificate, from the STIR/SHAKEN Policy Administrator. *Id.* at 12914-15, para. 28.

²² *Eighth Caller ID Authentication Report and Order*, 39 FCC Rcd at 12915-16, para. 29 n.137.

²³ *Id.*

“be better able to determine whether to retain or eliminate the SPC token extension at that time.”²⁴

Based on Bureau staff’s initial assessment of RMD submissions and the record in this proceeding, we continue to believe that the revised Token Access Policy has resolved the main practical concern that originally created a need for the SPC token extension. Staff conducted its initial review of RMD filings and found that 105 filings—only 1.13% of all filings in the database at the time of review—affirmatively claim in their RMD submission form that the provider qualifies for the extension because it is unable to obtain an SPC token.²⁵ The Bureau’s initial analysis also found that the claims in the submission form²⁶ for many of these filings do not fully explain why the provider is unable to obtain a token under the current Token Access Policy.²⁷ No provider submitted comments in this proceeding explaining why any providers remain incapable of obtaining an SPC token or otherwise asserting that the SPC token extension remains necessary. Conversely, one commenter urged the Commission to repeal the SPC token exemption, asserting that the steps to obtain a token “demonstrate a provider’s legitimacy and readiness to participate in the caller ID authentication ecosystem.”²⁸ Another commenter asked the Commission to require providers to explain with specificity why they cannot obtain an SPC token, including what steps they took to obtain a token and the obstacles they encountered.²⁹

The Bureau tentatively finds that the extension for providers that are incapable of obtaining an SPC token may no longer be necessary, but nevertheless concludes that the extension remains necessary at this time to enable Bureau staff to further evaluate the sufficiency and validity of the justifications given by providers claiming the extension and thereafter make a recommendation to the Commission on whether the extension should be repealed.³⁰ While Bureau staff anticipates that the extension may not be

²⁴ *Id.* In the Bureau’s December 2024 fourth annual revaluation of the STIR/SHAKEN extensions, it concluded that the SPC token extension should remain in effect so that the Commission may consider whether to retain the extension based on the Bureau staff’s still-ongoing assessment. *Wireline Competition Bureau Performs Required Evaluation of STIR/SHAKEN Implementation Extensions Pursuant to Section 64.6304(f) of the Commission’s Rules*, WC Docket No. 17-97, Public Notice, 39 FCC Rcd 13477, 13482-83 (WCB 2024) (*Fourth Reevaluation of STIR/SHAKEN Extensions Public Notice*).

²⁵ The Bureau’s calculation does not include filings explaining that the provider is in the process of obtaining an SPC token or that simply state the provider does not have an SPC token without claiming that the provider is unable to obtain a token.

²⁶ The Bureau’s initial review comprised an assessment of the claims filers made in the appropriate field of the RMD submission form and did not include a review of filers robocall mitigation plans, where filers may provide additional detail about information entered into the form.

²⁷ See ZipDX Comments (rec. Oct. 9, 2025) at 1-2 (explaining that some providers reference a lack of a 499-A Filer ID or OCN when claiming they are unable to obtain an SPC token but that, in its experience, “these are fairly easy to obtain if the applicant is in fact a Voice Service Provider as defined by the FCC”); ZipDX Reply (rec. Dec. 1, 2025) at 2 (“[W]e believe that the most expedient way to address this [extension] is to shine a bright light on these claims by leveraging the existing Robocall Mitigation Database.”); see also *Eighth Caller ID Authentication Report and Order*, 39 FCC Rcd at 12915-16, para. 29 (noting that one commenter asserted that some providers do not operate a business model that allows them to get an OCN but failed to explain why this would be the case for any provider with a STIR/SHAKEN implementation obligation). Some entities that cannot obtain an SPC token may have filed in the RMD and claimed the SPC token extension even if they do not have an obligation to file in the RMD. Such providers are not relevant to our analysis as to whether the extension remains necessary because they are not obligated to obtain an SPC token, and as such, do not need the SPC token extension.

²⁸ ACA International, National Council for Higher Education Resources, and National Consumer Law Center et al., Comments (rec. Nov. 18, 2025) at 11.

²⁹ ZipDX Comments at 2.

³⁰ We note that the Bureau lacks delegated authority to repeal the SPC token extension or set a termination date. See *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1896, paras. 72. As such, the Bureau’s

(continued....)

necessary in the future because of the ability of providers to obtain a token, retaining the extension at this time will prevent impact to the customers of any providers that are in fact incapable of obtaining a token.

We agree with ZipDX that more information is needed from many providers in order to justify the ongoing extension, and we note that providers claiming any extension are required to include in their RMD filings a detailed explanation why the provider asserts the extension applies,³¹ which in the case of the SPC token extension would include the steps they have taken to obtain a token and the specific obstacles they have encountered.³² Should providers fail to provide the requisite justifications for the ongoing necessity of the extension, the Bureau will have no choice but to recommend to the Commission that the extension be terminated. The Bureau reminds providers that they have an obligation to update their RMD filings within 10 business days of any change, including the need and bases for any extensions claimed, and that providers have an obligation to make truthful statements in their filings, subject to forfeiture.³³ We find that maintaining the extension while the Bureau assesses whether the extension is appropriate for repeal does not pose a significant barrier to the Commission's goal of ubiquitous implementation of STIR/SHAKEN because providers who have a STIR/SHAKEN implementation obligation cannot rely on the extension if they are able to obtain an SPC token under the Token Access Policy, and the overall percentage of providers claiming the extension at this time is small.³⁴

B. Extension for Small Voice Service Providers Originating Calls Via Satellite Using NANP Numbers

In the March 2023 *Sixth Caller ID Authentication Report and Order and Further Notice*, the Commission granted an undue hardship extension for STIR/SHAKEN implementation to small voice service providers that originate calls via satellite using NANP numbers.³⁵ The Commission concluded that an indefinite implementation extension was appropriate for such providers because “satellite service costs make the high-volume calling necessary for robocallers uneconomical,” there was “little evidence that satellite providers or their users are responsible for illegal robocalls,” and the number of satellite subscribers using NANP resources was “miniscule.”³⁶ The Commission concluded that the balance of benefits and burdens counseled “against requiring such providers to implement” STIR/SHAKEN.³⁷ Later, in its first two annual evaluations of this extension, the Bureau determined that the burdens and barriers to implementation faced by small voice service providers that originate calls via satellite using NANP numbers had not changed, and therefore found that the extension remained necessary without

assessment will be shared with the Commission so that the Commission has the opportunity to reevaluate whether to retain the extension.

³¹ See *Sixth Caller ID Authentication Report Order and Further Notice*, 38 FCC Rcd at 2596-97, para. 45; see also 47 CFR §§ 64.6305(d)(2)(i), 64.6305(e)(2)(i), 64.6305(f)(2)(i).

³² For example, Bureau staff found that some providers claim they cannot obtain an SPC token because they do not satisfy the Token Access Policy requirements to have a Form 499-A on file with the FCC or have not been assigned an OCN, but they do not explain any steps they took or impediments they encountered to file a Form 499-A or obtain an OCN.

³³ See 47 CFR §§ 64.6305(d)(5), 64.6305(e)(5), 64.6305(f)(5); 1.17(a); 1.80(b)(11) tbl. 1.

³⁴ Providers still may not have a STIR/SHAKEN implementation obligation if they are subject to another extension or exemption, including the exemption for providers who lack control of the infrastructure necessary to implement STIR/SHAKEN. See *supra* note 6.

³⁵ *Sixth Caller ID Authentication Report and Order and Further Notice*, 38 FCC Rcd at 2614-15, paras. 79-82. The Commission also concluded that satellite providers originating calls using non-NANP numbers are not “voice service providers” within the meaning of the TRACED Act and thus did not need to reach the question of whether a STIR/SHAKEN implementation extension was necessary for such providers. *Id.* at 2613-14, para. 78.

³⁶ See *id.* at 2614-15, para. 81.

³⁷ See *id.*

modification.³⁸

As in the previous annual reevaluations, we find that the extension for small voice service providers that originate calls via satellite using NANP numbers remains necessary without modification. The Satellite Industry Association (SIA) supports retaining the extension, explaining that “the factors contributing to the Commission’s prior determination to grant the extension have not changed”—namely that “the number of voice service customers relying on Satellite [voice service providers (VSPs)] remains low, the Commission has not identified evidence that Satellite VSPs or their customers perpetrate illegal robocalls, and the characteristics of satellite voice service do not support high volume, low duration calls characteristic of illegal robocalls.”³⁹ No party countered these assertions. We will continue to watch for any “unforeseen abuses”⁴⁰ of the extension to ensure the Commission can act promptly to address them and will continue to reevaluate the need for the extension, consistent with the goal of achieving full participation in the STIR/SHAKEN framework by small voice service providers that originate calls via satellite using NANP numbers as promptly as reasonable, including whether there are any meaningful costs or technical barriers that inhibit STIR/SHAKEN implementation by these providers.⁴¹ We find that maintaining the extension for now will not pose a significant barrier to the Commission’s goal of ubiquitous implementation of STIR/SHAKEN.⁴²

C. Other Issues

Contact Information. For further information, please contact Chris Laughlin, Deputy Division Chief, Competition Policy Division, Wireline Competition Bureau, at 202-418-2193 or by email at Chris.Laughlin@fcc.gov.

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³⁸ See *Third Reevaluation of STIR/SHAKEN Extensions Public Notice*, 38 FCC Rcd at 11917-18; *Fourth Reevaluation of STIR/SHAKEN Extensions Public Notice*, 39 FCC Rcd at 13483-84.

³⁹ SIA Comments at 1-2 (rec. Oct. 3, 2025).

⁴⁰ *Sixth Caller ID Authentication Report and Order and Further Notice*, 38 FCC Rcd at 2615, para. 82.

⁴¹ TRACED Act § 4(b)(5)(D), (F); 47 U.S.C. § 227b(b)(5)(D), (F).

⁴² Bureau staff identified only four RMD filings where the provider claimed this extension. See also ZipDX Reply at 2 (“We do not believe that extension has a substantive impact on STIR/SHAKEN effectiveness . . .”).