verizon

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November 19, 2018

The Honorable Ajit V. Pai
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Call Authentication Framework*, WC Docket No. 17-97

Dear Chairman Pai:

Thank you for your recent letter to Verizon CEO Hans Vestberg about the importance of efforts to fight unwanted robocalls, including implementation of the STIR/SHAKEN call authentication standard to address the problem of caller ID spoofing by bad actors.[1] Verizon reiterates both our commitment to deploying the "STIR/SHAKEN" call authentication technology to protect consumers from spoofed calls, and to attacking the robocall problem on multiple other fronts. We know that our customers hate unwanted and illegal robocalls, and we are committed to taking aggressive steps to address this growing problem.

Based on our deployment plans and our understanding of the timelines of other service providers, we expect that a large portion, and possibly a substantial majority, of the voice minutes that Verizon customers send and receive will be "signed" under the STIR/SHAKEN authentication standard in 2019. We have invested substantial amounts of time and resources upgrading our networks with the STIR/SHAKEN technology and will continue to do so. Indeed parts of our VoLTE platform, which serves the largest number of our wireless customers, are already STIR/SHAKEN-ready. Consistent with our understanding of other wireless providers' plans, we expect the rest of our VoLTE production to follow in the first half of 2019. We also are investing to update relevant wireline infrastructure and to coordinate with other service providers who are early adopters of STIR/SHAKEN.[2] And we have completed initial testing with our principal interexchange entity (MCI Communications Services, Inc., d/b/a Verizon Enterprise Solutions) to ensure that its systems can pass the STIR/SHAKEN portion of the "SIP header" for messages that include the STIR/SHAKEN token.

Important work remains to maximize STIR/SHAKEN's benefits for consumers. We are active participants in an ongoing industry dialogue focused on potentially standardizing the display framework

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[1] *See* Letter from Ajit V. Pai, FCC, to Hans Vestberg, Verizon (Nov. 5, 2018), https://docs.fcc.gov/public/attachments/DOC-354933A14.pdf.

[2] Verizon has worked successfully with many vendors to achieve accelerated delivery deadlines for software capabilities based on the requirements we been supplied to them. Some vendors for some wireline platforms, however, have not matched our desires and expectations to achieve full deployment in 2019. That will not hold back the benefits of STIR/SHAKEN for a majority of Verizon customers.

for presenting the results of STIR/SHAKEN authentication (the "verstat") directly to consumers. Starting early next year, Verizon plans to enhance our existing blocking and labeling tools with data analytics that take into account the results of call authentication. These efforts will assist Verizon and other stakeholders in deciding how best to communicate the verstat to customers.

A second imperative is swiftly putting in place an industry-led certificate governance regime that will support efficient, widespread cross-carrier passing of call authentication tokens. A Verizon representative sits on the Board of the Governance Authority, which is working to meet the timelines proposed by the North American Number Council and endorsed by the Commission.

In addition to the letters you sent Verizon and other major voice providers about our commitments to STIR/SHAKEN, your other recent actions demonstrate the sort of leadership required to overcome the collectivity challenges[3] that so far have thwarted industry efforts to effectively address the problem. First, correctly stressing that robust industry-led traceback can help address the robocall problem, you rightly called on all service providers to participate in good faith in industry traceback efforts.[4] We are very supportive of traceback efforts and believe that they are an integral part of identifying and stopping bad actors, but to be truly effective more widespread participation by additional providers is needed. Second, you provided much-needed clarity about the expectation that voice providers must have meaningful processes in place to avoid originating illegal robocall traffic or traffic that is unlawfully spoofed.[5] That principle is crucial because although Verizon and some other voice providers have "know your customer" processes to avoid inadvertently serving illegal robocallers, some unscrupulous voice providers routinely look the other way while originating millions of calls that they know or should know are illegal. The Commission should continue to find targeted but effective ways to press "holdout" voice providers into following industry best practices on traceback and "know your customer" procedures.

Solving the robocall problem requires an "all of the above" approach, and Verizon stands ready to work with the Commission and other stakeholders on any and all initiatives that can lead to material reductions in unwanted and illegal robocalls.

Sincerely,

Joseph J. Russo

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[3] *See, e.g.*, Verizon Comments, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, at 7-8 (July 20, 2018).

[4] *See* Letters from Rosemary C. Harold, Chief, FCC Enforcement Bureau, to 382 Communications, Global Voicecom, IP Link Telecom, R Squared Telecom, Sonic Systems dba Talkie Communications, Thinq, TouchTone Communications, and XCast Labs (Nov. 6, 2018), https://docs.fcc.gov/public/attachments/DOC-354942A2.pdf.

[5] *Id.* (specifically letters to IP Link Telecom, R Squared Telecom, Sonic Systems dba Talkie Communications, and XCast Labs).