Kenneth Culpepper
Senior Director, Regulatory Affairs

Cox Communications – Law & Policy
6205-B Peachtree-Dunwoody Road
Atlanta, GA 30328
404 269-6735
Kenneth.Culpepper@cox.com

November 19, 2018

VIA EFCS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *Call Authentication Trust Anchor*, WC Docket 17-97

Dear Ms. Dortch:

Attached is Cox Communications' response to Chairman Pai's November 5 letter regarding Cox's plans for implementation of the SHAKEN/STIR framework.

Sincerely,

Ken Culpepper
Senior Director, Regulatory Affairs
Cox Communications

Attachment

cc (via e-mail): Deborah Salons
Jenny Prime

Jennifer Hightower
Senior Vice President and General Counsel

Cox Communications – Law & Policy
6205-B Peachtree-Dunwoody Road
Atlanta, GA 30328
404 269-7364
Jennifer.Hightower@cox.com

November 19, 2018

Chairman Ajit Pai
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Dear Chairman Pai:

In response to your letter to Pat Esser, president of Cox Communications, Inc., dated November 5, 2018, Cox is pleased to provide the following information.

As your letter notes, Cox is committed to implementing a robust call authentication framework in 2019. Cox has been actively involved for several years in the efforts to develop the SHAKEN/STIR framework in various industry standards fora. This includes participation on The Alliance for Telecommunications Industry Solutions (ATIS)/SIP- Forum IP-NNI Task Force and the Robocall Strike Force. Cox was also a participant in the Call Authentication Trust Anchor (CATA) working group of the North American Numbering Council (NANC) which led to the NANC recommendations referenced in your letter. And today, Cox is engaged in the ATIS activities involving the establishment of the SHAKEN/STIR governance authority.

Cox is currently transitioning its residential customer base to a new IP Multimedia Subsystem (IMS) platform which will include the capability for deployment of the SHAKEN/STIR solution. The residential customer base will be substantially migrated to this new voice services platform throughout 2019. Based on Cox's vendor's commitments, the current timeline for deployment of the SHAKEN/STIR framework for Cox's residential customers can be divided into the following four phases:

- Phase 1: Vendor production testing with a focus on call-signing – Q4, 2018: In this Phase, Cox's new voice services platform's vendor is conducting production testing of the SHAKEN/STIR call-signing and call-verification functional solution. Cox's vendor will perform call-signing on a significant majority of subscriber originated calls later in this phase. Cox and its vendor will evaluate the results of these tests and ensure their success before proceeding to Phase 2.
- Phase 2: Continued vendor production testing with a focus on call-verification– Q1, 2019: In this phase, Cox's platform vendor will be conducting production call-verification validation on signed-terminating calls. The validation is contingent upon interoperability with other voice service providers to ensure compatibility. Cox and its vendor will evaluate the results of the tests and ensure their success before proceeding to Phase 3.

- Phase 3: Cox production call-signing and call-verification – Q2, 2019 and beyond: In this phase, Cox will perform call-signing and call-verification to the entire subscriber base that has been migrated to Cox's new voice services platform. Cox will evaluate the results of the solution before proceeding to Phase 4.
- Phase 4: Customer facing display of verification status – Q3, 2019: In this phase, Cox will enable verification status indicators to customers. To ensure consumer trust in SHAKEN/STIR results, the three previous phases were carefully scoped to ensure systemic and interoperability issues within SHAKEN/STIR are identified and corrected prior to customer-facing indicator enablement, so issues are not experienced by consumers, such as inconsistent verification status.

As described above, Phase 4 is an initial step in Cox's plans to enable consumer information sharing – through the development of a technical capability. Cox is currently evaluating the best means by which to indicate improperly signed or unsigned calls via this capability. ATIS has produced a Technical Report suggesting a framework for signaling verified Caller ID information from the network to a User Equipment (UE) and displaying the information on the UE in a uniform manner, independent of technology. Conceptually this represents a viable means by which to inform customers of call status, but Cox believes the industry would benefit from a single standard if this framework is to be successful.

In addition, it should also be noted that Commission decisions in open proceedings may impact the need to inform customers of unsigned calls via status indicators. For example, the Commission has specifically asked if carrier-initiated blocking should be allowed on unsigned calls (see FCC 17-24, paragraph 32). Should the Commission authorize such blocking and provide a safe harbor to carriers electing to block such calls, the need to present customers with call status information may be mitigated.

Cox is supportive of the Commission's efforts to stop unwanted robocalls and will do its part to ensure the success of those efforts.

Sincerely,

Jennifer Hightower
Senior Vice President and General Counsel
Cox Communications