December 11, 2017

Via Email
Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* – Advanced Methods to Target and Eliminate Unlawful Robocalls –
     CG Docket No. 17-59

Dear Ms. Dortch:

On December 7, 2017 representatives from the Alliance for Telecommunications Industry Solutions (ATIS) met with Eric Burger, Chief Technology Officer, and Kenneth Carlberg, Chief Technologist with the Public Safety and Homeland Security Bureau, to discuss ATIS' proposal related to the Signature-based Handling of Asserted information using toKENs (SHAKEN) Governance Authority. The written presentation discussed during the meeting is attached hereto.

ATIS explained the importance of flexibility in tackling the challenges associated with illegal robocalling. ATIS also noted the need for the industry to gain operational experience in the near future to be fully prepared for wide scale SHAKEN deployment.

During the meeting, a question was asked about whether membership in ATIS would be required for stakeholders to participate in ATIS' proposed Governance Authority construct. ATIS explained that membership in ATIS would not be a requirement for participation in either the proposed Governance Authority or its Advisory Council. The ATIS Robocalling Testbed was also discussed and a question was asked about "observers" in this initiative. It was explained that the rationale for allowing observers was to accommodate service providers who were not ready to participate in testing immediately, but who wanted to observe testing to gain insight into the state of SHAKEN implementations and to understand what would be required to directly participate in SHAKEN testing in the future.

In attendance representing ATIS at this meeting were Susan Miller, President and CEO; Thomas Goode, General Counsel; and Jim McEachern, Senior Technology Consultant.

A copy of this letter is being filed in the above-referenced docket.

If there are any questions, please contact the undersigned.

Sincerely

Thomas Goode
ATIS General Counsel

cc: Eric Burger, Chief Technology Officer, Office of Strategic Planning & Policy Analysis
        Kenneth Carlberg, Chief Technologist, Office of the Bureau Chief, PSHSB

SHAKEN

Jim McEachern

Senior Technology Consultant

ATIS

Tom Goode

General Counsel

ATIS

December, 7, 2017

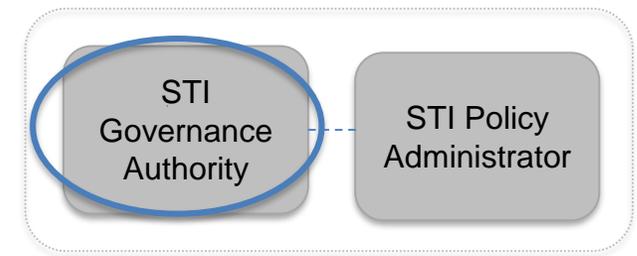*Advancing ICT Industry Transformation*

Purpose

- Provide an update on industry efforts to create the ecosystem necessary to facilitate the implementation of SHAKEN.

- Provide information on the steps ATIS is taking in the near term.

- Discuss long term deployment strategies.

Key Messages

- Flexibility will be the key to tackling this problem.
  - The moment that SHAKEN reduces illegitimate robocalls, the problem will evolve
  - Mean time to respond (MTTR) will be a critical success factor
  - An independent industry-led GA can maximize responsiveness

- It is also important that the industry gain operational experience in the near future to be fully prepared for widescale SHAKEN deployment.

- ATIS is prepared to serve as the STI-GA and is well-positioned to move forward quickly (1st Quarter 2018).

- ATIS' construct recognizes and balances important needs (based on sound technical input, neutral, open and transparent, reflecting evolving needs and capabilities).
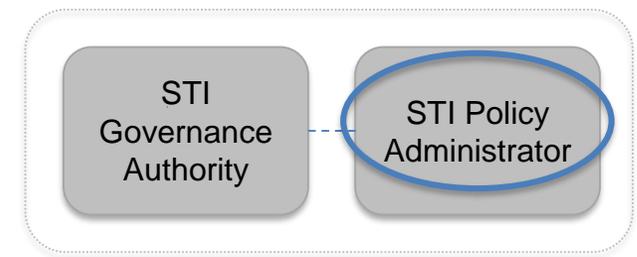
STI-GA Qualifications

- Under ATIS' proposed "hybrid" structure, the governance authority would:
  - Be established and operated by the industry under the umbrella of a multi-stakeholder organization in collaboration with FCC;
    - Recognized by the FCC, but independent and able to make necessary changes to policies without lengthy rulemakings or contract negotiations;
  - Use consensus-based, open, and transparent procedures to define the policies governing acquisition/issuance of STI certificates and management of Public Key Infrastructure (PKI);
  - Include broad participation from stakeholders and timely feedback mechanisms;
  - Use flexible processes that allow for the expeditious evolution of policies and procedures based on actual deployment experience and the response of malicious entities; and
  - Leverage industry technical expertise to identify and analyze technical issues.

ATIS as STI-GA

- ATIS is well-positioned to serve as the STI-GA.
  - Proven experience managing complex projects using open, consensus-based and equitable processes.
  - A trusted, technically-focused organization.
  - Membership includes key stakeholders and ATIS has experience in encouraging participation by all segments of the industry.
  - A neutral, industry-led body that can resolve issues fairly, effectively and in timely manner.
  - Expertise managing industry resources and maintaining fair and effective guidelines that are used broadly by the industry.
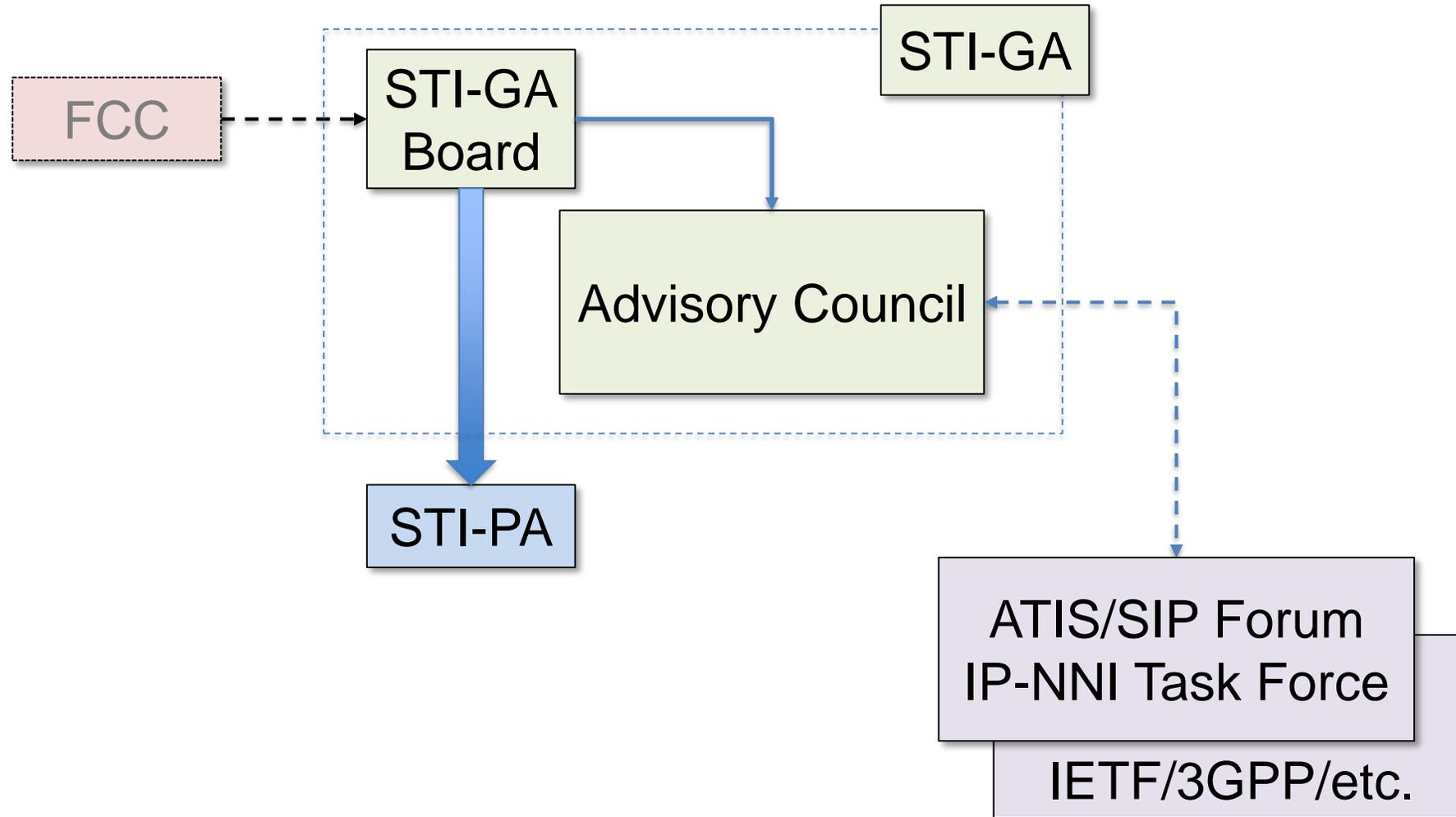
STI-PA Qualifications

- Detailed STI-PA procedures being defined by ATIS SIP Forum Joint IP-NNI Task Force; this work will provide additional detail about the STI-PA's role in:
    - Implementing policies established by the STI-GA, including policies to confirm that service providers are authorized to request certificates and to authorize the certification authority to issue STI certificates;
    - Managing an active, secure list of approved certification authorities, in the form of their public key certificates, and provide this list to the service provider; and
    - Maintaining a distinct PKI for digitally signing service provider code tokens.

- ATIS believes that, to perform these roles effectively, the STA-PA needs expertise/experience
    - Efficiently executing well-defined processes,
    - Managing industry resources, such as numbering databases and/or certificate management.

Principles Underlying ATIS' STI-GA Construct

STI GA - Balancing Stakeholder Needs

- **ATIS' construct recognizes and balances a range of needs**:
    1. Based on sound technical input
    2. Implementable by the industry
    3. Reflect evolving needs and capabilities
    4. Open and transparent
    5. Neutrally managed
    6. Minimize and fairly allocate cost
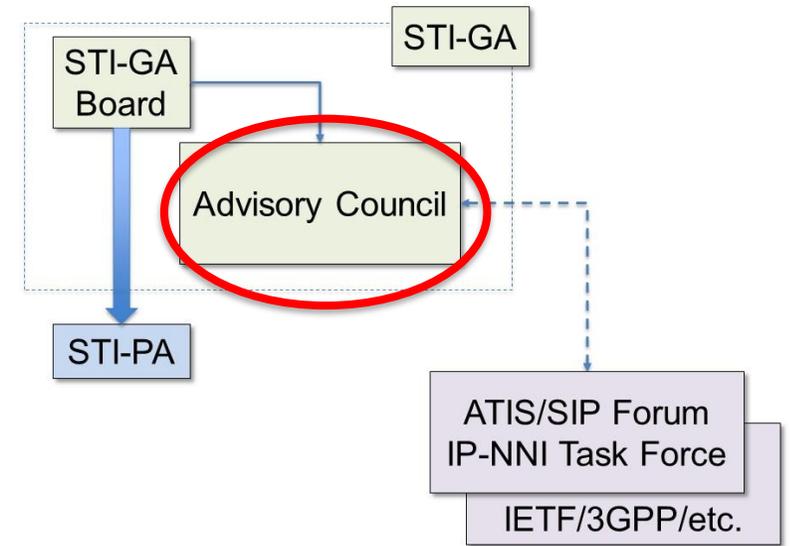   7. Early operational experience

STI-GA: Proposed Structure

STI GA - Balancing Stakeholder Interests
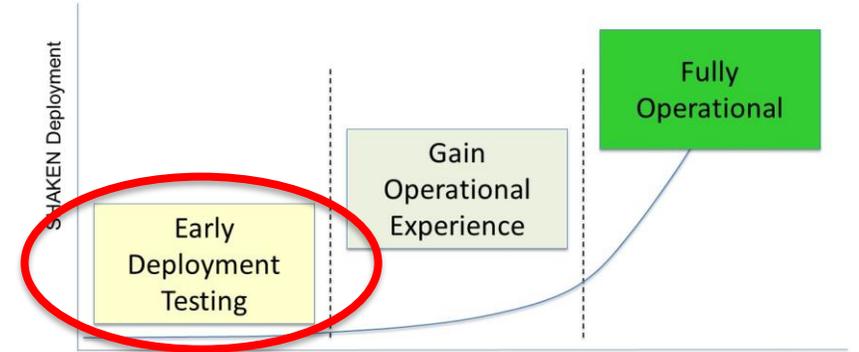
2. Implementable by the industry

– Ensure deployable and effective solutions

• **Advisory Council:**

– Appointed by STI-GA to focus on concrete issues

– Membership based on expertise - not limited to Board companies

– Analyses SHAKEN compliance questions as directed by the SSTI-GA Board

– Solicits technical input from relevant industry bodies (e.g., IP-NNI TF, IETF, and 3GPP)

– Recommends governance policies to the Board, based on further analysis of technical input

STI GA - Balancing Stakeholder Interests

7. Early operational experience

– Gain experience with certificate management and governance during early SHAKEN deployment.

• **STI Governance Authority:**

– Launch STI-GA during early SHAKEN deployment phase.

– Establish and validate certificate management processes to ensure effective operation as SHAKEN deployment accelerates.

– Establish process to analyze, approve and implement revised SHAKEN certificate management processes

ATIS' Proposed SHAKEN Governance Roll-Out

Operate and Evolve STI-GA:
- Enhance functionality
- Identify & correct certificate misuse

Fully operational phase

2019

Launch STI-GA:
- Operationalize certificate management
- Validate Service Provider "token" process

Gain operational experience

1Q2018

Define Governance Structure:
- Roles
- Responsibilities

Ready for Pre-Deployment

Now

Conclusion/Next Steps

- ATIS' work to address robocall issues continues:
  - Develop enhancements to technical specifications;
  - Further detail the SHAKEN Governance Structure.

- ATIS continues to work toward launching the industry led STI-GA in Q1 2018.
  - ATIS believes that it is important that the STI-GA gain early operational experience to validate processes prior to volume deployment.

- ATIS acknowledges that the FCC has, and will continue to have, an important role in enforcing robocalling rules, and would be the "backstop" to ensure that an industry-led GA is fair:
  - However, ATIS' view is that the industry should drive this effort

- ATIS is well-positioned to serve as the STI-GA.

Questions?

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