June 30, 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 June 28, 2017, representatives from the Alliance for Telecommunications Industry Solutions
(ATIS) met with representatives from Chairman Pai's office to discuss its efforts to further
progress the Signature-based Handling of Asserted information using toKENs (SHAKEN)
governance structure.

During the meeting, ATIS provided an update on the industry's efforts to operationalize the
SHAKEN Governance Model and Certificate Management, which defines the protocol to obtain
Secure Telephone Identify (STI) certificates. ATIS provided an update on its work to develop a
governance structure that identifies key functions, responsibilities and engagement. ATIS also
noted that it has received significant support for a governance authority construct that balances the
interests of stakeholders and is based on transparent, open, and consensus-based processes. The
written presentation discussed during the meeting is attached hereto.

In attendance from Chairman's Pai office were Kristine Fargotstein, Acting Wireline Advisor and
Kenzie Nothnagel, Intern. In attendance representing ATIS were Susan Miller, President and
CEO; Jim McEachern, Senior Technology Consultant; and Thomas Goode, General Counsel.

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: Kristine Fargotstein, Acting Wireline Advisor
        Kenzie Nothnagel, Intern

Robocalling: Secure Telephone Identity Governance Authority (STI-GA) Proposal

Susan Miller

CEO & President

ATIS

Jim McEachern

Senior Technology Consultant
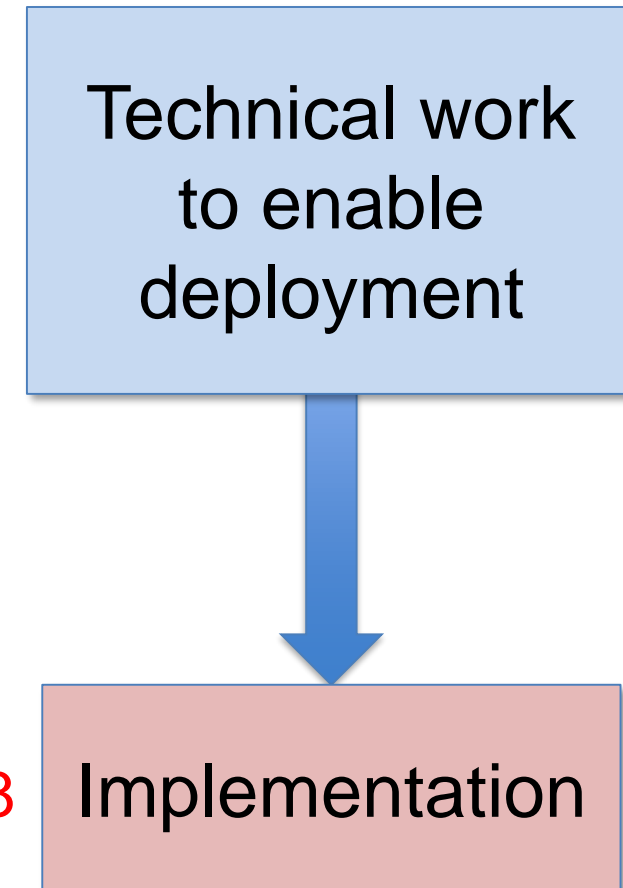
ATIS

Tom Goode

General Counsel

ATIS

June 28, 2017

Background

- As part of its multi-pronged approach to address robocalling and caller-ID spoofing, ATIS is progressing technical specifications to support mitigation techniques.

- This presentation provides further input regarding industry efforts to "operationalize" SHAKEN by developing a governance structure identifying key functions, responsibilities and engagement.

  - Governance Authority

  - Policy Administrator

  - Stakeholders, including service providers, vendors, application developers.
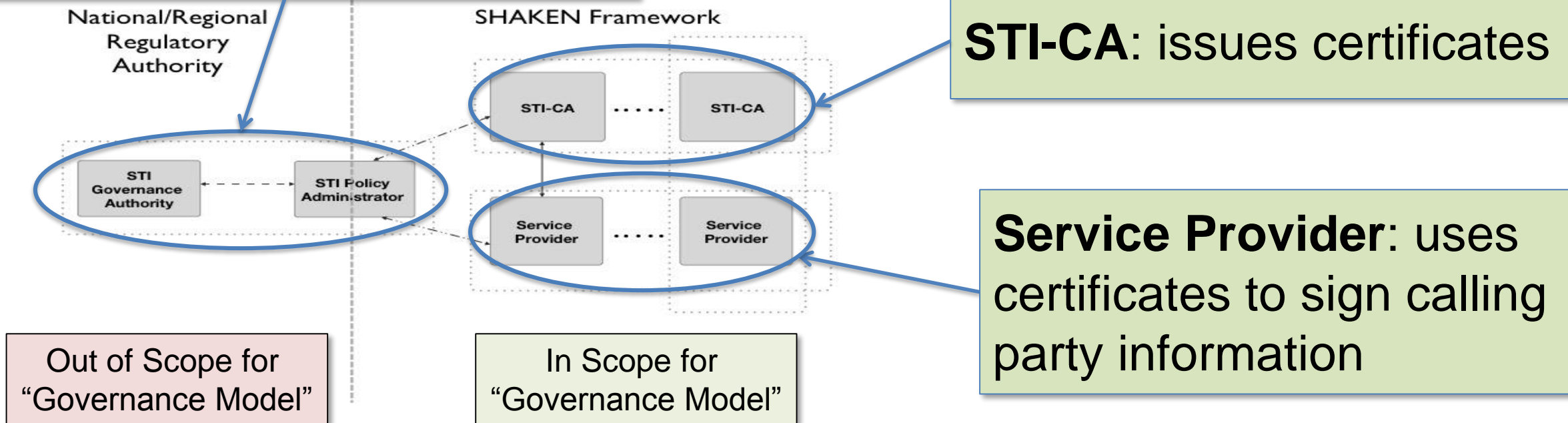
SHAKEN Deployment

✓ SHAKEN specification

✓ Certificate management structure (governance model)

❑ Procedures (Policy Administrator) – Oct 2017

❑ Implementation and deployment:

- Display framework – Sept 2017

- Best practices – 4Q 2017

- Deployment metrics – 4Q 2017

❑ Governance Authority: Ready to Launch – 4Q 2017 / 1Q 2018

Technical work to enable deployment

Implementation

SHAKEN Governance Model: Overview

Secure Telephone Identity: Governance

STI-CA: issues certificates

Service Provider: uses certificates to sign calling party information

National/Regional Regulatory Authority

SHAKEN Framework

STI-CA · · · · · STI-CA

STI Governance Authority ←→ STI Policy Administrator

Service Provider · · · · · Service Provider

Out of Scope for "Governance Model"

In Scope for "Governance Model"

STI-GA & STI-PA are identified in the SHAKEN certificate management specification

STI Governance

There are two main governance roles identified in the SHAKEN certificate management specification:

- STI Policy Administrator (STI-PA):
  - Issues Service Provider Code tokens to service providers
  - **ATIS/SIP Forum IP-NNI Task Force** is further defining this role
    - Estimated completion October 2017
- STI Governance Authority (STI-GA):
  - Manages and directs the STI Policy Administrator
  - **ATIS** is continuing to develop and advance this role
   - Estimated completion 4Q 2017/1Q 2018

Role of the STI Governance Authority (STI-GA)

As outlined in the SHAKEN certificate management specification, the STI-GA:

- Ensures ongoing effectiveness of SHAKEN
- Defines rules for STI Certificates
- Selects the STI Policy Administrator

ATIS is working with industry via ATIS and the SIP Forum's diverse membership to identify and define:

- The appropriate role of industry and an interface with the FCC in the STI-GA, including stakeholder participation;
- Processes that allow certificate management to innovate to respond to evolving robocalling-related challenges; and
- Funding options.
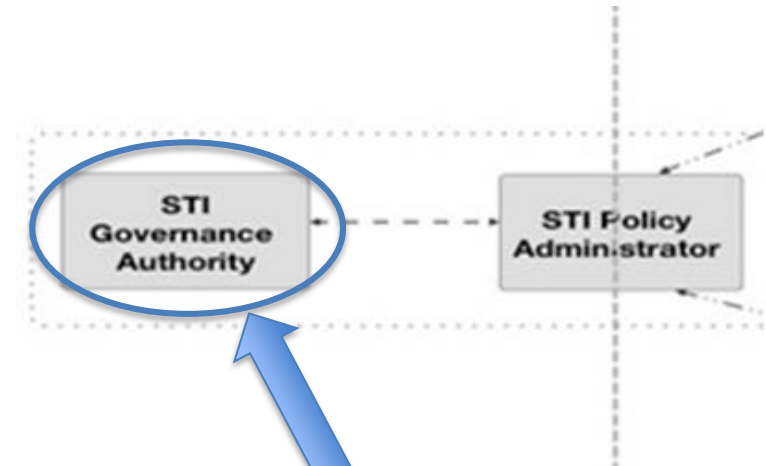
ATIS is defining this role in consultation with industry, via the diverse ATIS/SIP Forum membership.

Possible Approaches: Role of Industry and FCC

- Regulatory Mandate creating Governance Authority:
  - Rules established by FCC
  - Example: NPAC

- Hybrid:
  - Explicit regulatory direction or implicit regulatory endorsement of an industry approach
  - Example: Administrative Council for Terminal Attachments (Part 68 registration)

- Industry "Committee" creating Governance Authority:
  - Industry creates and manages structure
  - Example: ATIS IMSI Oversight Council

FCC Directed

Recommended approach
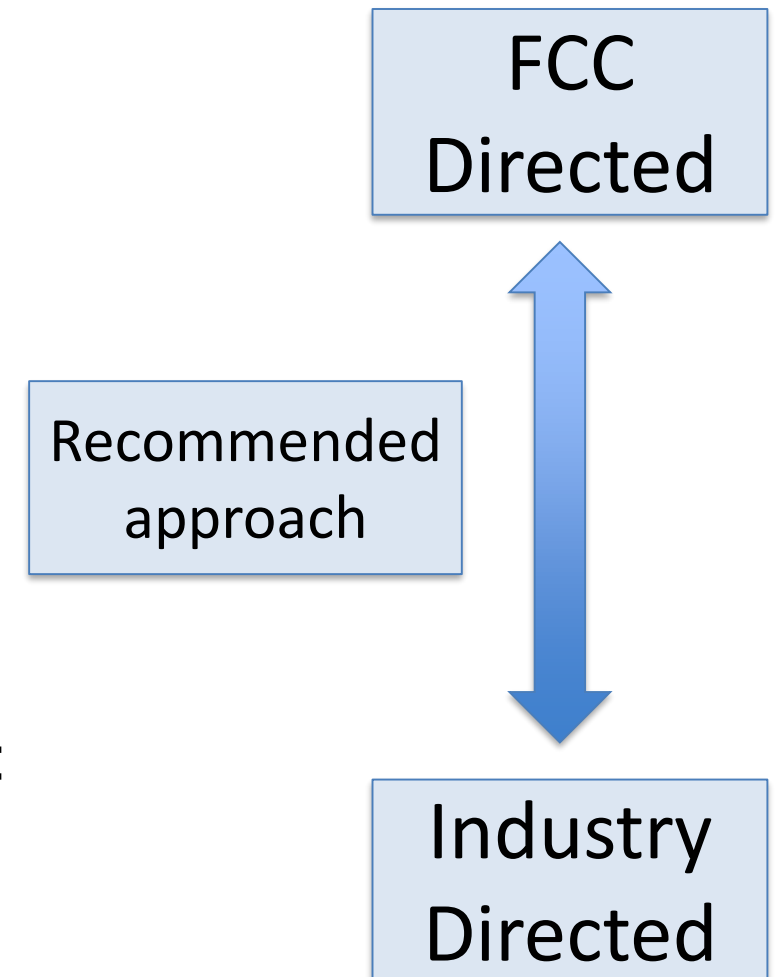
Industry Directed

Possible Approaches: Role of Industry and FCC

Regulatory Mandate

FCC Directed: Rules established by FCC and used by STI-GA. Changes to governance rules require formal regulatory process.
Example: NPAC

Hybrid (Recommended)

Industry defined and operated, with regulatory endorsement. Retains flexibility to respond to evolving robocalling "threat".
Example: Administrative Council for Terminal Attachments (Part 68 reg)

Industry Committee

Industry Directed: Industry creates and manages structure autonomously.
Example: ATIS IMSI Oversight Council

ATIS Input: Role of Industry and FCC

- Hybrid approach offers:
  - Greater flexibility to expeditiously address evolving threats
  - Fast implementation
  - Opportunities for the industry to add additional functionality
  - Ongoing technical input from industry
  - Transparency and broad buy-in based on open, consensus-based structure
  - Lower cost
  - FCC endorsement of industry-directed STI-GA can increase participation without need for formal mandates
- Strong support from service providers for hybrid approach.

Governance Authority: Hybrid Approach

- ATIS establishes a governance authority:
  - Neutral industry body, representing a full range of stakeholders:
    - Service providers: wireline, wireless, cable, CLEC, VoIP, OTT
    - Equipment and other vendors
    - Third-party application providers
  - Balances interests of stakeholders:
    - Open, multi-stakeholder, consensus-based processes
    - Ensure no one class of member dominates
    - Ensure key stakeholders can shape strategic direction

Governance Authority: Implementing the Hybrid Approach

- STI-GA would select STI-PA via RFP

- Governing Board would oversee STI-GA and address issues that may arise within STI-PA

- Possible STI-GA Working Groups to develop consensus-based recommendations to Board on specific issues

- Focus on development in U.S. to set model for implementation by other countries (one STI-GA per country)

- Recognized by the national regulator, but independent.
  - Acknowledgement/endorsement by the FCC, with on-going communications/updates by STI-GA to FCC

Next Steps

- ATIS will continue to work with stakeholders to further develop governance authority:
  - Stopping unwanted robocalls requires an ongoing flexible approach
  - **Key**: governance authority that incorporates flexibility to react to evolving threat
  - **Goal**: ready for launch by early 2018, but is dependent on FCC response to *NOI*
- ATIS will provide input to the *NOI*
  - ATIS believes the FCC is asking the right questions
- Ongoing collaboration between the stakeholders and the FCC is central to success.