Operational Challenges of STIR/SHAKEN for Rural Operators

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Nearly 850 providers in 45 states, serving 35% of the U.S. landmass

- Avg. Pop. Density ~7/sq. mile
- Avg. Serving Area 2200+ Sq. Miles
- 60% of RLEC customers served via FTTP
- 25% of RLECs have <2/sq. mile
- Nearly 70 SRC Awards
- More than 175 Gig Certifications
Rural Operators

• Strongly committed to combatting the “scourge” of unwanted robocalls.
  • Unwanted calls (particularly spoofed calls) are at the top of the subscriber complaints list.
  • NTCA members are community-based: their subscribers are their friends, family and neighbors.
  • Access line loss has been dramatic and will accelerate as consumers ignore their landlines.
• Rural operators have “skin in the game.”
  • NTCA has a seat on the STI-GA board.
  • NTCA has contributed to funding the GA.
The “IP Transition” Has Reached NTCA’s Rural America

• NTCA members ARE NOT “THE TDM CARRIERS”

• Perception
  • “Stodgy old telephone companies that cling to TDM”

• Reality
  • Switching
    • 93% of RLECs are using IP-enabled switches
    • Most companies with TDM switches in use serve fewer than 1650 customers

• Substantial Broadband Deployment
  ➢ 70% of customers – access to at least 25/3 Mbps
  ➢ 57% of customers – access to at least 100 Mbps
  ➢ 23% of customers – access to at least a Gig
SHAKEN/STIR “Hurdles” for Rural Operators

• Equipment availability
  o NTCA members are relying on their switching vendors.
    ❖ Most vendors are in or completing the testing phase.

• Cost
  o Potentially significant.
    ❖ Resources are spread thin (and focused on fiber buildouts), and video and mobile wireless continues to be break even lines of business at best.
    ❖ Like any other cost, these must be recovered from a small customer base.
How do we move forward and protect rural consumers?

• IP Interconnection
  • “Hold Harmless”?  
  • “Rural Transport Rule”?  

• Exempt TDM providers from any mandate

• “Out-of-Band” SHAKEN?
How do we move forward and protect rural consumers?

• “Guardrails” around call blocking
  • Lack of authentication alone should not be the basis for blocking a call.
    • Blocking on this basis alone would introduce “reverse call completion” problems for millions of consumers.
  • Blocking should be limited to calls for which a terminating provider has some indicia of a maliciously altered or inserted certificate.

• Protection from “false positives”
  • Terminating providers should implement a process that allows for a rapid redress of “false positives” (or inadvertently blocked calls).
QUESTIONS?

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