

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
 - NTCA members are relying on their switching vendors.
 - ❖ Most vendors are in or completing the testing phase.
- Cost
 - 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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