



SIPNOC 2024

Update on the STI-GA

&

Overview of Proper Attestation

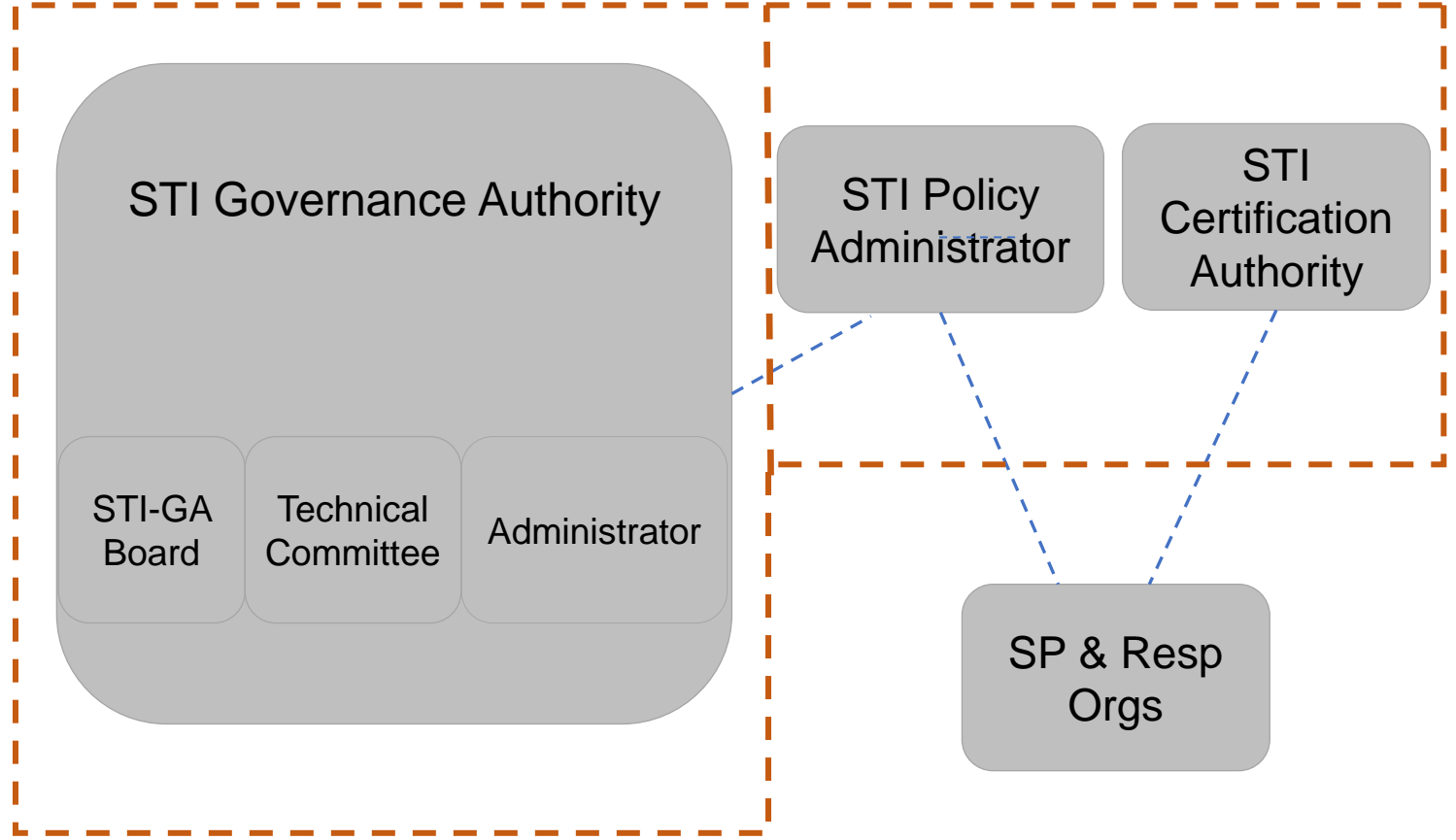
Linda Vandeloop
Chair, STI-GA Board

Brent Struthers
Director, ATIS/STI-GA

September 19, 2024

STIR/SHAKEN Oversight

STIR/SHAKEN Standards



STI Governance Authority (STI-GA)

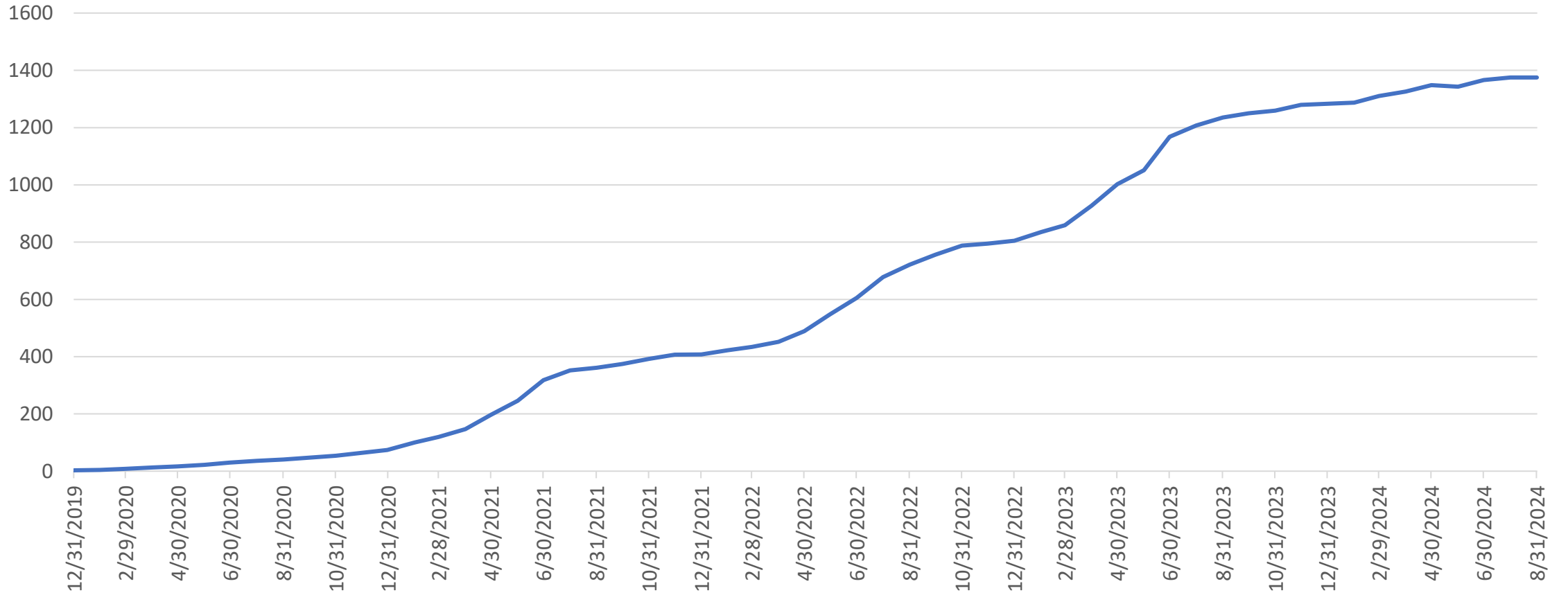
- Defines the rules governing SHAKEN ecosystem
- Manages the STI Policy Administrator (STI-PA)
- Ensures security and integrity of STIR/SHAKEN ecosystem

STI-GA Board

- Board composition (and nominating organization):
 - Chair: Linda Vandeloop, AT&T
 - Vice Chair: Glenn Clepper, Charter Communications (NCTA)
 - Brian Hurley, ACA Connects
 - Nathan Sutter, Nex-Tech Wireless (CCA)
 - Beth O'Donnell, Comcast
 - John Marinho, CTIA
 - Darah Franklin, Google
 - Greg Rogers, Bandwidth (INCOMPAS)
 - Dave Frigen, Wabash Communications (NTCA)
 - Philip Linse, Lumen (US Telecom)
 - Gunnar Halley, Microsoft (VON)
 - Michael Starkey, QSI Consulting, Inc. (TEXALTEL)

Service Provider Participation

- 1377 authorized STI Participants as of 08/31/2024



Budget and Funding

SHAKEN Framework Budget

- STI-GA, STI-PA, and Contingency Fund for other costs, such as Change Orders

2024 SP Payments

- Minimum - \$500
 - Maximum – \$100,000
 - Contribution Factor: .00002722
 - All the above 2024 costs apply through 12/31/2024
- 2025 Budget in line with prior years
 - Costs not increasing as number of participating SPs rises
 - 2025 STI-PA fees TBD, but unlikely for an individual SP fee to be higher than 2024 unless that SP's telecom revenues are substantially higher.

Policy Revisions

- SPC token Revocation Policy
 - Lays out the review process for when complaints are received against an authorized SP
- CA Suspension and Revocation Policy
 - Allows for suspension of STI-CA if they fail to comply with CP
- Certificate Policy
 - Board adopted a minor update of its Certificate Policy in August (CP version 1.4.2)
 - No need for STI-CAs to file revised CPS, no change to OID
 - Aligns with CA Suspension and Revocation Policy
- Funding Policy
 - Board is currently working to determine the contribution factor for 2025

STI-GA Actions

- Delinquent Payers
 - SPC token revocation due to non-payment
 - STI Participant agreement allows for SPC token revocation in the event of non-payment or when an STI Participant fails to provide data necessary for the STI-PA to determine a participant's correct fee.
- Other STI-GA Enforcement Consideration
 - Enforcement focused on ensuring authorized SPs, Resp Orgs, and STI-CA's comply with STI-GA Policies
 - FCC Action against SPs
 - If FCC removes SP from the Robocall Mitigation Database, or the SP deletes its own, the SP no longer qualifies for SPC token access
 - Improper Attestation & Authentication
 - SPs improperly attesting to calls or using STI certificate to authenticate false information in recognized extensions (rcd, rph, and div) are not in compliance with STI-GA policies
 - STI-GA has provided guidance on improper attestations

STI-GA Actions in 2024

- Multiple complaints filed against authorized SPs in 2024
 - All complaints involved “improper attestation,” signing A-level attestation on calls for which the customer did not have the right to use the TN
 - STI-GA has revoked and reinstated SPC tokens and put multiple SPs on suspension
 - The STI-GA’s goal is not to remove SPs from the SHAKEN ecosystem, but to ensure they are implementing SHAKEN properly

Overview of Proper Attestation

Purpose of Overview

- The industry continues to see improper attestations.
- This overview is intended to provide guidance.
- Service providers must consult with their legal counsel for interpretation of the relevant regulations.

Attestation

Attestation is a process specifically defined within the SHAKEN standard. Any Attestation level set that does not conform with the industry standards set in ATIS 1000074.

- A-Level Attestations denote that the OSP has a direct authenticated relationship with the customer from which the call came and can verify the customer's right to use the Telephone Number (TN) in the caller ID field.
- B-Level Attestations denote that the originating SP has a direct authenticated relationship with the customer from which the call came but cannot verify the customer's right to use the TN in the caller ID field.
- C-Level Attestations denote only that the call signer has no relationship with the initiator of the call. In this case the call signer is making no claim whatsoever about the accuracy of the TN in the caller ID field or the customer that initiated the call.

Improper Attestation

An Improper Attestation includes any call where an originating service provider (OSP) signs a call with a level of Attestation inconsistent with the information it has, or is required to have, about the call.

- Improper Attestations may include, but are not limited to:
 - An A-Level Attestation on an illegally spoofed call. Indicators of an illegally spoofed TN are unallocated, invalid or on a reasonable Do Not Originate list. But a legitimate TN could also be illegally spoofed.
 - A B-Level Attestation where the originating provider has not validated the customer.
 - A C-Level Attestation on a call when the OSP provides the Attestation. (This does not apply to Gateway and Intermediate SPs, when they are required by the FCC to sign unsigned calls.)

Considerations for Proper Attestation

- Customer Contracts
 - Having a contract that shifts responsibility to your SP customer may not be sufficient as the call-signer is still the party responsible for setting attestation
- Know Your Customer
 - Identify the customer and its right to use any TNs it plans to use for outbound calling
 - A-Level attestation can be provided TNs assigned directly to the customer by the originating SP
 - Local policy allows other options for determining A-Level attestation. For example, a service provider could require customers to list in an LoA each phone number from which they will originate calls
- The signing SP is ultimately responsible for ensuring a proper attestation

How to Work With the STI-GA

- Communicate
 - The STI-GA will never make a determination that an SP has improperly attested to calls before trying to communicate directly with the SP in question.
 - Please ensure that your contact information with the STI-PA is correct, so the STI-GA can contact you.
- Take Action
 - Once the STI-GA has determined improper attestation has occurred, it will want to know what action have you taken to address the issue
 - Primary interest is in fixing the issue, not assigning blame, making sure attestation is being applied properly

Ultimately, It is your SPC token and STI Certificate at risk, not your customer's

Resource Links

- STI-GA
 - STI-GA Policy: <https://sti-ga.atis.org/#resources/>
- STI-PA
 - Service Provider & Resp Org Registration:
 - <https://authenticate.iconectiv.com/service-provider-authenticate>
 - Authorized STI-CAs:
 - <https://authenticate.iconectiv.com/approved-certification-authorities>

Questions?