



# SIPNOC 2025

## Update on the STI-GA

### &

## How to Know Your Customer

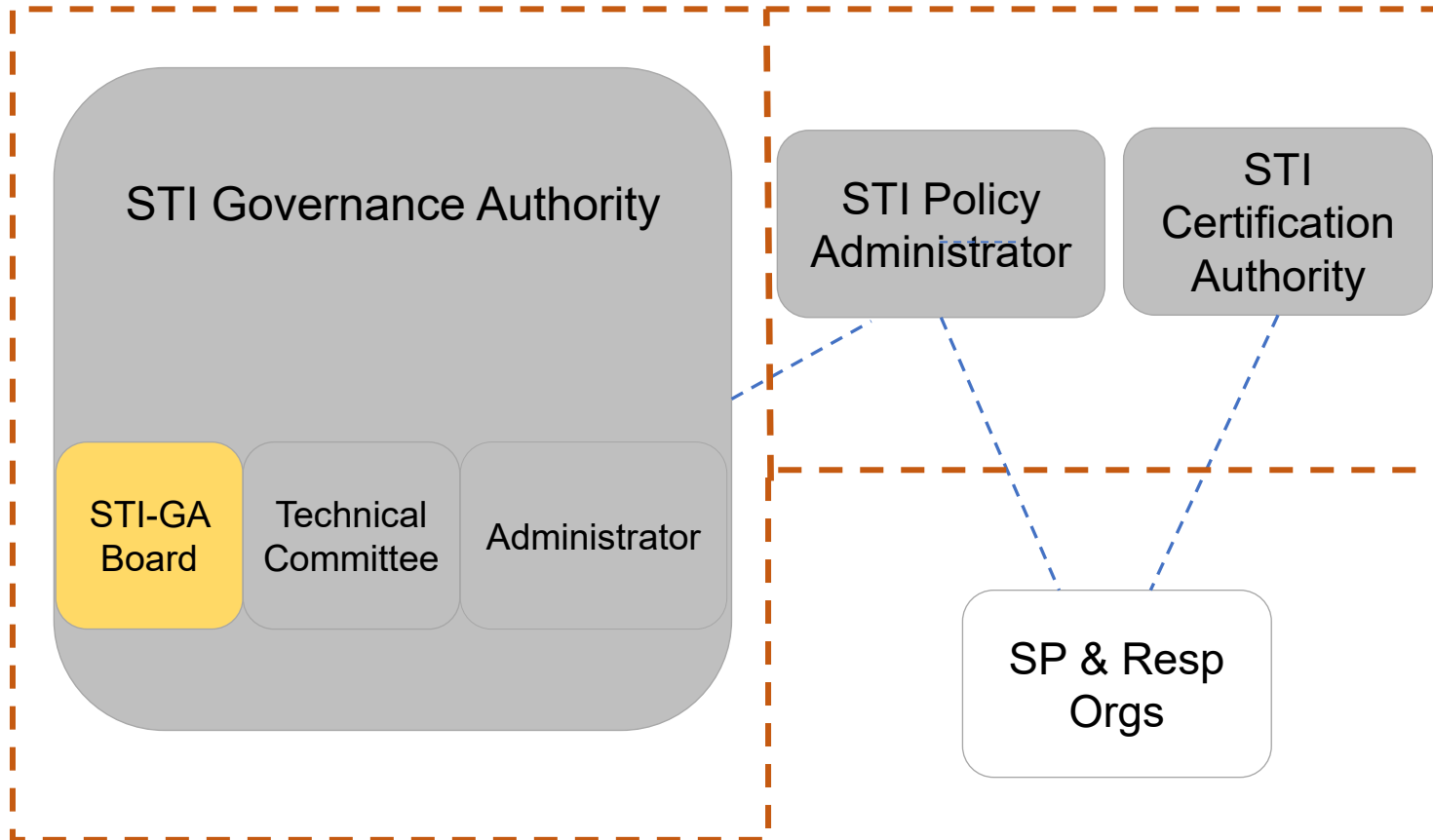
Glenn Clepper  
Chair, STI-GA Board

Brent Struthers  
Director, ATIS/STI-GA

September 16, 2025

# STIR/SHAKEN Oversight

## STIR/SHAKEN Standards



## STI Governance Authority (STI-GA)

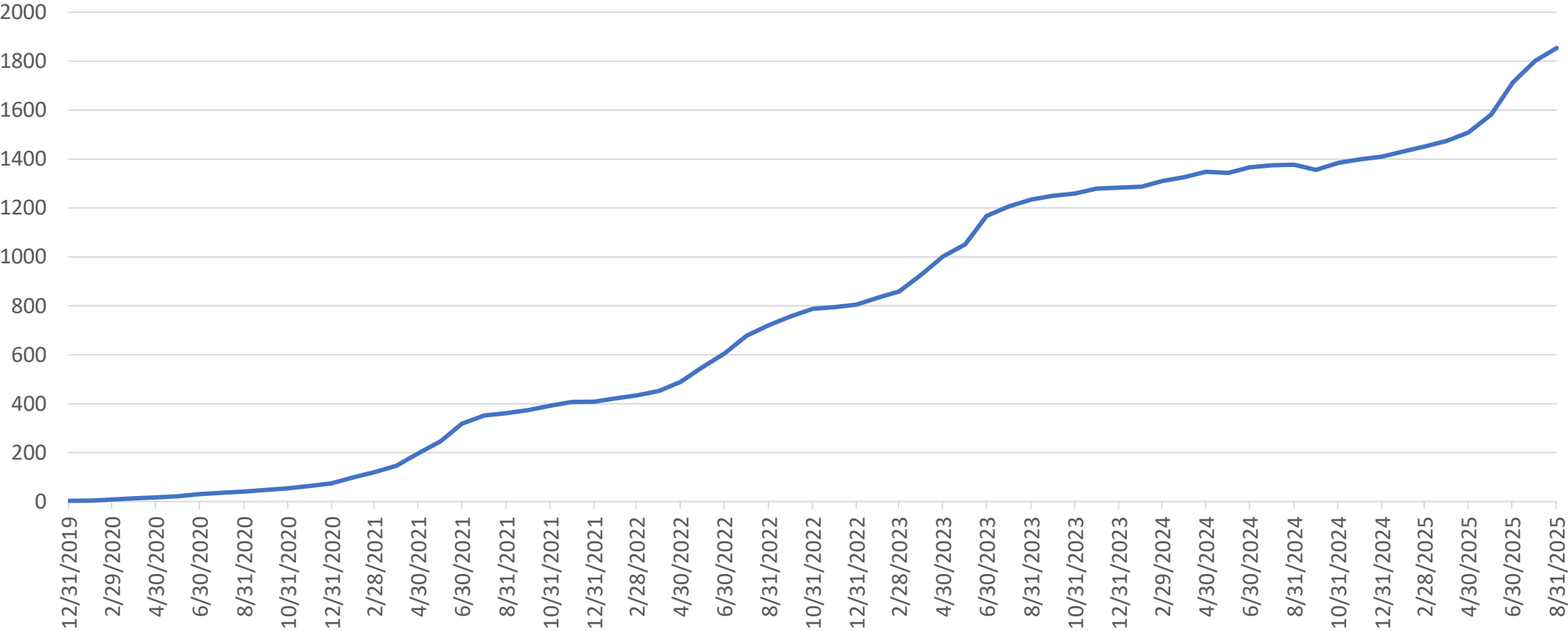
- Defines the rules governing SHAKEN ecosystem
- Manages the STI Policy Administrator (STI-PA)
- Ensures security and integrity of STIR/SHAKEN ecosystem
- 2025 Changes in Board

# STI-GA Board

- Board Composition (and nominating organization):
  - Chair: Glenn Clepper, Charter Communications (NCTA)
  - Vice Chair: Gunnar Halley, Microsoft (VON)
  - Bill Tortoriello, ACA Connects
  - Angela Dais, AT&T
  - 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)
  - Elizabeth Gray Nunez, Verizon (US Telecom)
  - Michael Starkey, QSI Consulting, Inc. (TEXALTEL)

# Service Provider Participation

- 1854 authorized STI Participants as of 08/31/2025



# Budget and Funding

## SHAKEN Framework Budget

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

## 2025 SP Payments

- Minimum - \$450
- Maximum - \$97,500
- Contribution Factor: 0.00002705
- All the above 2025 costs apply through 12/31/2025
- 2026 Budget slightly higher than previous years
  - 2026 STI-PA fees TBD in October

# Policy Revisions

- SPC token Access Policy
  - Policy Change Request denial
- Conflict of Interest Policy
  - Addressing potential conflicts between SHAKEN framework participants
- Funding Policy
  - Board is currently working to determine the contribution factor for 2026

# STI-GA Actions

- Delinquent Payers
  - SPC token revocation due to non-payment or failure to provide 499A revenue data.
    - 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-CAs comply with STI-GA Policies
  - FCC Action against SPs
    - When FCC removes SPs from the Robocall Mitigation Database, or the SP deletes its own registration, 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 (rca, rph, and div) are not in compliance with STI-GA policies
    - STI-GA has provided guidance on improper attestations

# STIR/SHAKEN & Knowing Your Customer

# STIR/SHAKEN Attributes

- Service provider collection and validation of a customer's information including use of a telephone number
- Allows terminating providers and analytics service to gauge the reputation of both the signing provider and that provider's customer

# Relevant ATIS Documents

- Customer Definition (ATIS 1000089 - ATIS Technical Report)
  - Customer: Typically, a service provider's subscriber, which may or not be the ultimate end-user of the telecommunications service. In the context of the SHAKEN attestation model, the Customer is the entity with a direct business relationship and a direct user-to-network interface with the OSP. Enterprises, hosted/cloud service providers, Over the Top (OTT) providers and other service resellers may be considered customers of an OSP depending on the use case
- Attestation (ATIS 1000074 - SHAKEN Standard)
  - Both A and B-Level STIR/SHAKEN attestation require the signing service provider have "a direct authenticated relationship with the customer and can identify the customer."

# ATIS 1000074 – SHAKEN Standard cont.

- Reputation of the call signer
  - The validated claims and the validated identity of the entity signing the claims can both be used to determine the level of trust in the originating entity and their asserted calling party information. Call blocking applications or other mitigation techniques could use the information over time to determine “reputation” of the entity signing the token, which could provide further input to determine the level of trust for the calling party information
- Reputation of the call signer’s customer
  - STIR/SHAKEN passports allow for each customer to have a unique origination identifier created and managed by the service provider. This allows data analytics to establish a reputation profile and assess the reliability of information asserted by the customer assigned this unique identifier

# FCC Rules on Customer Verification

- Section 64.1200(n)(4) of the Commission's rules
  - Requires a voice service provider to “[t]ake affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including ***knowing its customers*** and exercising due diligence in ensuring that its services are not used to originate illegal traffic.”
- Recent FCC Enforcement Actions
  - The FCC has specified that “such measures may include, for example, obtaining supporting records to verify the customer’s identity, such as copies of government issued identification, corporate formation records, and third party records of a customer’s physical address where the new customer will be using services that allow it to originate a significant volume of calls.”

# Conclusion

- When you sign a call, you are saying more than “my customer has the right to use that phone number”
- You are also telling other SPs (and the FCC) that you have taken the steps necessary to “know” your customer
- To the extent you do not do a thorough job of vetting your customers and the traffic you originate, other providers and analytics services may use STIR/SHAKEN data to gauge the reputation of both you and your customer and treat traffic from you according to that reputation
  - This can affect the treatment of ALL traffic you originate
- Failure of the OSP to properly perform know your customer measures may result in improper attestation
  - Improper attestations can result in token revocation

# 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?