

Prepare for the FCC SHAKEN Deadline

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Presenters



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The Problem!
Caller ID Spoofing
STIR/SHAKEN and what it promises
PASSporTs and the Identity Header
the STIR/SHAKEN Architecture
Certificate Management
Attestation levels
Verstat or Verification Status
Authentication and
Enterprises and getting an 'A'

Delegate Certificates and other solutions
Rich Call Data
International STIR/SHAKEN
Out of Band STIR/SHAKEN
Call Diversion



Call Analytics
The June 30th deadline!
The Law
Robocall Mitigation plans
Traceback and the Industry Traceback Group

About TransNexus

- Serving Voice Providers since 1997
- On-premises and Cloud software solutions
- Policy tools to complement your softswitch or SBC
 - CDR rating and analysis
 - Least Cost Routing
 - Toll fraud controls
 - TDoS and Robocall controls
 - SHAKEN
 - Robocall Mitigation

Agenda

1. Overview of FCC regulations
2. How to fulfill Regulatory Requirements for SHAKEN
3. How Integrate SHAKEN into your network
4. SHAKEN Implementation Demo
5. Questions and Answers

Overview of FCC Regulation

The TRACED Act brought profound changes in telecom regulation

- Dec 2019 Congress passed the [TRACED Act](#)
 - All voice providers must implement call authentication by June 30, 2021
- Mar 2020 - FCC mandates STIR and SHAKEN¹
- Sep 2020 - Extension for TDM and small providers until June 2023²
- Dec 2020 - Know Your Customer and Police your network³
- Dec 2021 - June 2022 deadline for small, Over the Top (OTT), providers⁴



1. [Docket 17-97, 1st Order](#), Paragraph 37, “service that is interconnected with the public switched telephone network and that furnishes voice communications to an end user.” Paragraph 60, “defined on a call-by-call basis”
2. [Docket 17-97, 2nd Order](#), Paragraph 40, “we grant a two-year extension for small voice service providers, which we define as those with 100,000 or fewer voice subscriber lines”
3. [Docket 17-59, 4th Order](#), Paragraph 32, “We require that all originating voice service providers know their customers and exercise due diligence in ensuring that their services are not used to originate illegal traffic”
4. [Docket 17-97, 4th Order](#), Paragraph 1, “require non-facilities-based small voice providers to implement STIR/SHAKEN by June 30, 2022”

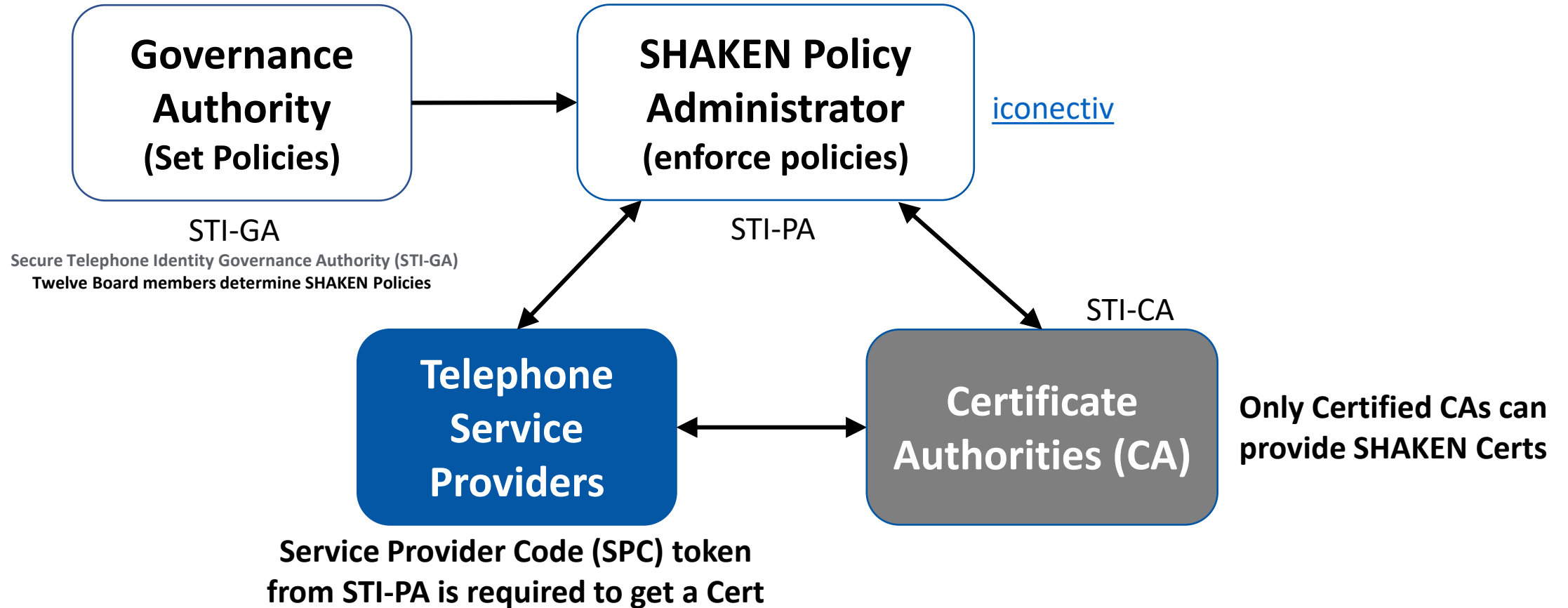
Impacts of FCC Order for Small OTT Providers

- New order became effective on February 24, 2022
- March 10, 2022 – Update FCC Robocall Mitigation certification that 2023 extension no longer applies
 - Providers who did not update their certification received a letter from the FCC
- Update FCC Robocall Mitigation certification within 10 days after implementing SHAKEN
- Implement SHAKEN no later than June 30, 2022, or expect to hear from the FCC Enforcement Bureau

The FCC is Serious about Enforcement

- The FCC is reviewing Robocall Mitigation Database Certifications
 - Are Robocall Mitigation plans viable?
 - Are Full SHAKEN certifications bogus?
- Robocall Enforcement Actions
 - 2021 – Fourteen
 - 2022 – Four as of March 22, 2022
- <https://www.fcc.gov/robocall-facilitators-must-cease-and-desist>

The SHAKEN Eco-system



STI-PA Registration Requirements

| Requirement | Cost |
|--|----------------------------|
| Current FCC Form 499-A | Depends on annual revenue |
| Robocall Mitigation Database Certification | \$0 |
| Operating Company Number (OCN) | \$425 - \$550 one time |
| Register with the STI-PA | \$825 - \$143,925 per year |

FCC Form 499-A

- Contribution to Universal Service Fund (USF) based on revenue
 - No contribution for 2022 if revenue less than **\$38,610.04**
- Steps to file a Form 499-A
 1. [Register](#) with the FCC to get a Federal Registration Number (FRN)
 2. Google “Get an FCC DC Agent for Service of Process”
 3. Do you have a Form 499-A on file? Check the [database](#)
 4. Watch the Form 499 training [video](#)
 5. [Register](#) for a 499 ID and complete the forms

FCC Robocall Mitigation Database

- Certify you have implemented a Robocall Mitigation Plan
 - Plan documents “specific reasonable steps taken to avoid originating illegal robocall traffic”
 - Indicates that you have a small provider extension until June 30, 2022
 - Link to the [FCC Robocall Mitigation Database](#)

Operating Company Number (OCN)

- Link to get an OCN from [NECA](#)
 - NECA has 1,300 telephone company members and provides tariff, regulatory and database services
- Small OTT VoIP companies are in the Internet Protocol Enabled Services (IPES) OCN category
- Requirements for an IPES OCN
 - Proof of existence – Articles of Incorporation with state seal
 - Proof of service – interconnection agreements with your VoIP providers
 - Proof of customers – contractual agreements with end-user customers
 - NECA may request additional documentation
 - \$425 for 10-day service, \$550 for 3-day service

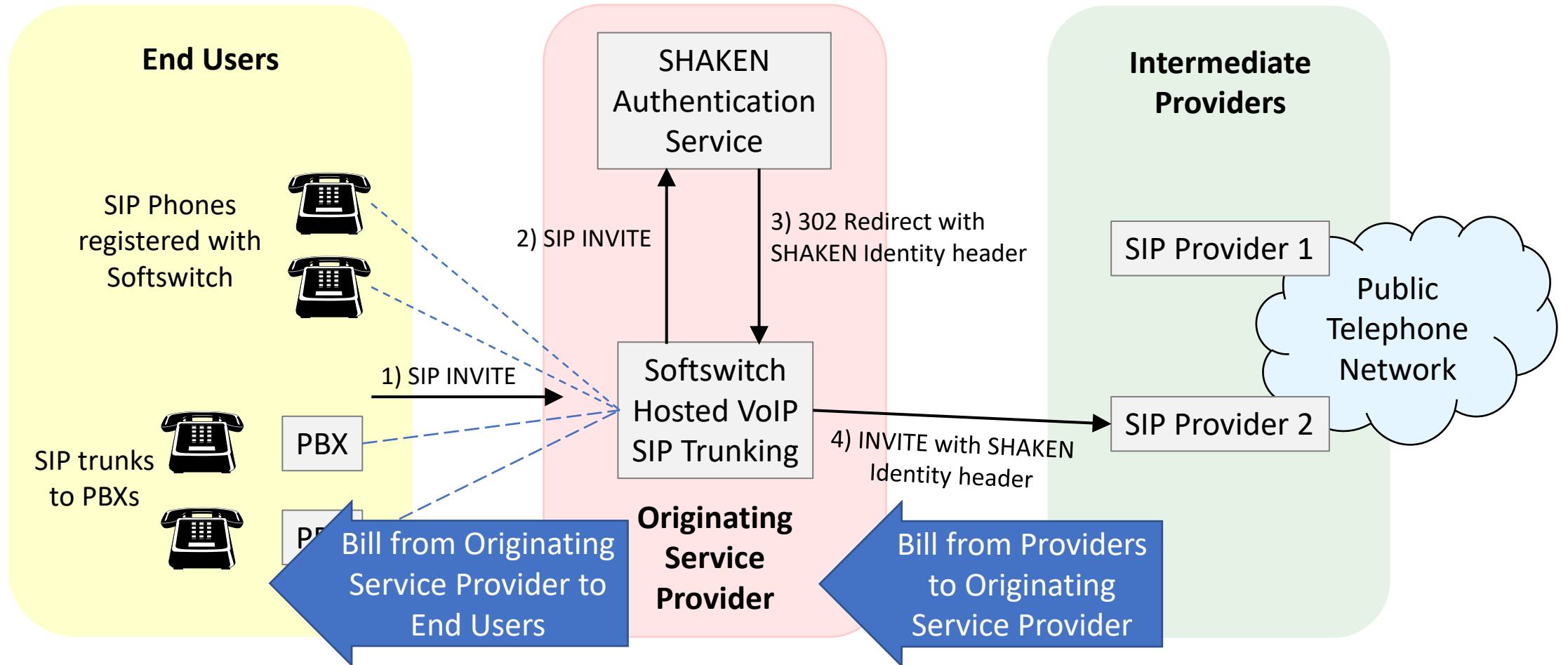
Register with the STI-PA

- [Authorized](#) Service Providers
- Read the STI-PA [Service Provider Guidelines](#)
- [Register](#) with the STI-PA (iconectiv)
 1. Information needed: OCN, Form 499A with total revenue and billing contact
 2. Select Account Type = Service Provider (do not select Certificate Authority or RespOrg)
 3. SPC Token Expiry timer value (we recommend one day)
 4. IP addresses for whitelisting (ask your SHAKEN vendor)
- Once you are registered, you will receive an SPC Token
 - Proves you are a member of the SHAKEN eco-system
 - Enables you to obtain a SHAKEN certificate from a SHAKEN certificate authority

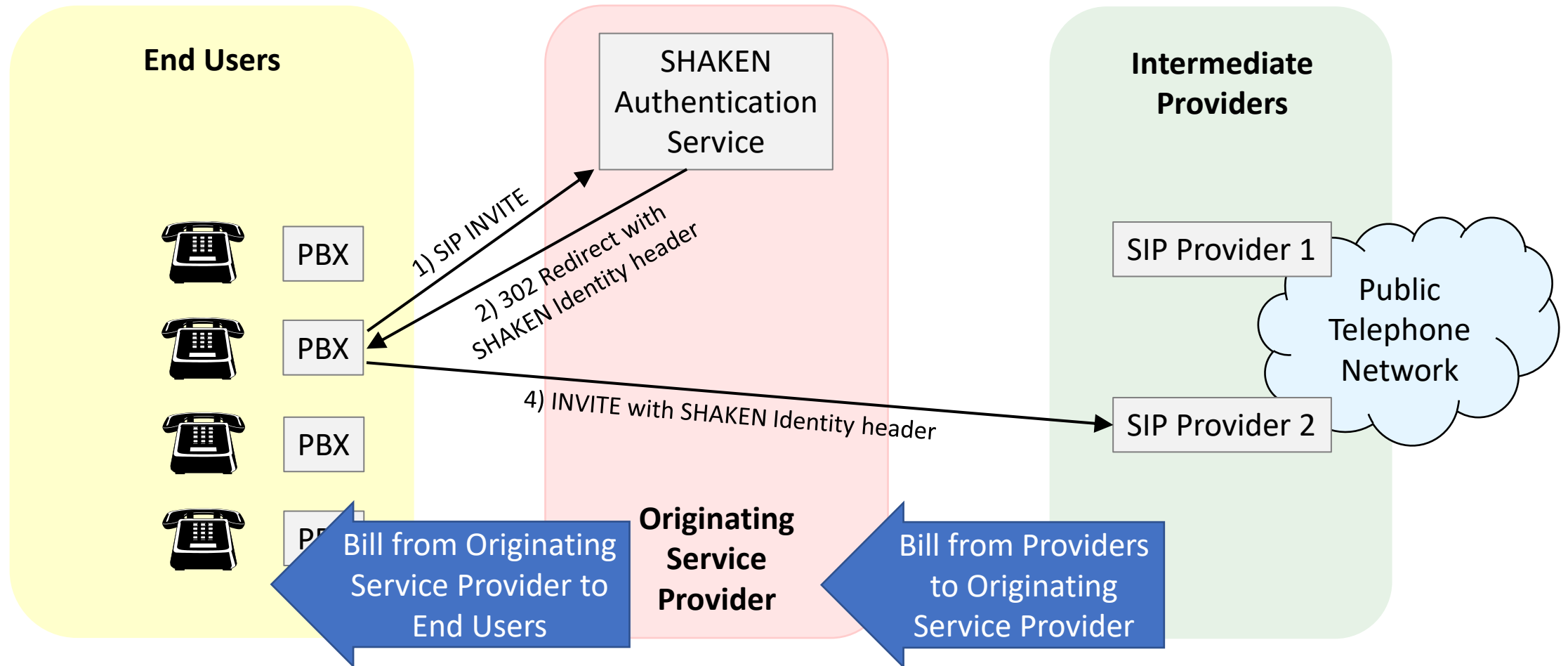
What is SHAKEN Attestation?

- SHAKEN Attestation indicates level of trust
- A = Full Attestation: The signing provider shall satisfy all of the following conditions:
 - Is responsible for the origination of the call onto the IP-based service provider voice network.
 - Has a direct authenticated relationship with the customer and can identify the customer.
 - Has established a verified association with the telephone number used for the call.
- B = Partial Attestation: Trusted relationship with the customer
 - Call from a end user trunk group
- C = Gateway Attestation: No trust
- Defined in [ATIS-1000074](#) section 5.2.3

SHAKEN Integration with Central Switch



SHAKEN Integration with Distributed PBXs



Question and Answers

- You will receive an email with a link to this webinar recording and slides
- E-mail Jim.Dalton@TransNexus.com with questions
- Need SIP training? Go to [The SIP School](#)
- Is there a special deal available?
 - Free Robocall Mitigation Plan - \$1,000 value
 - Must use TransNexus SHAKEN solution by June 1, 2022
 - Must submit [request](#) before midnight, Monday, April 18, 2022
Include “Jim’s Webinar Promo” in your request