Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	

JOINT COMMENTS OF INCOMPAS AND
THE CLOUD COMMUNICATIONS ALLIANCE

INCOMPAS and the Cloud Communications Alliance ("Alliance") submit these joint comments in response to the *Public Notice* regarding the efficacy of STIR/SHAKEN as required by the Telephone Robocall Abuse Criminal Enforcement and Deterrence Act ("TRACED Act").[1] We strongly support the Commission's efforts to curb illegal calls, including wide adoption and implementation of the STIR/SHAKEN caller ID authentication framework.[2] As explained below, more needs to be done. Primarily, the efficacy of STIR/SHAKEN is undermined by the lack of IP interconnection throughout the call chain. The continued presence of TDM networks frustrates the ability of STIR/SHAKEN to help mitigate illegal calls and will hamper the evolution of STIR/SHAKEN technology to provide verified caller identity.

INCOMPAS and the Alliance further urge the Commission to expand its assessment of STIR/SHAKEN's efficacy beyond technical authentication to include its real-world impact on

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[1] *Wireline Competition Bureau Seeks Comment on Two Periodic Traced Act Obligations Regarding STIR/SHAKEN Caller ID Authentication*, WC Docket No. 17-97, DA 25-763 (rel. August 27, 2025).

[2] INCOMPAS remains an active participant in the work of the Secure Telephone Identity—Governance Authority, which defines the rules governing the certificate management infrastructure to ensure effective use and security of SHAKEN certificates and is committed to continuing the development and implementation of the STIR/SHAKEN framework.

illegal call mitigation. Despite widespread deployment, illegal robocalls remain persistently high, underscoring the need for enhanced capabilities, such as the inclusion of Rich Call Data, to verify caller identity. We encourage the Commission to support this evolution of the STIR/SHAKEN framework through standardized, interoperable, and identity-vetted solutions.[3]

I. AN IP INTERCONNECTION FRAMEWORK IS NEEDED TO ENSURE THE EFFICACY OF STIR/SHAKEN

The TRACED Act mandates the Commission, every three years, "assess the efficacy of the technologies used for [the] call authentication frameworks" and "based on that assessment . . . revise or replace the call authentication frameworks . . . if the Commission determines it is in the public interest."[4] In its *First Triennial Report* in 2022, the Commission determined that it would assess the efficacy of STIR/SHAKEN by how well it performed the function of authenticating caller ID, not whether STIR/SHAKEN is reducing the incidence of illegal or unwanted calls.[5] The Commission concluded, based on the record before it, that STIR/SHAKEN was effective at authenticating calls when properly implemented in provider networks.[6]

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[3] INCOMPAS and the Alliance welcome the Commission's subsequent adoption of a *Further Notice of Proposed Rulemaking* in WC Docket No. 17-97 to determine the need for improved caller identity information and whether providers should be required to use RCD whenever they transmit caller identity information. *See Advanced Methods to Target and Eliminate Unlawful Robocalls*, *Call Authentication Trust Anchor*, *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, *Dismissal of Outdated or Otherwise Moot Robocalls Petitions*, CG Docket No. 17-79, WC Docket No. 17-97, CG Docket Nos. 02-278, 25-307, Ninth Further Notice of Proposed Rulemaking in CG Docket No. 17-79; Seventh Further Notice of Proposed Rulemaking in WC Docket No. 17-9; Further Notice of Proposed Rulemaking in CG Docket No. 02-278; Public Notice in CG Docket No. 25-307, para. 51 (rel. Oct. 29, 2025) ("*Caller Identity FNPRM*").

[4] TRACED Act § 4(b)(4)(A)-(B).

[5] Federal Communications Commission, Triennial Report on the Efficacy of the Technologies Used in the STIR/SHAKEN Caller ID Authentication Framework, at 8 (2022) ("*First Triennial Report*").

[6] *Id.* at 9-10.

We believe the Commission should take a broader view when assessing STIR/SHAKEN's efficacy. The goal of the technology is to securely convey to the terminating provider who the originating provider is and the originating caller's right to use the number in the caller ID. The continuing presence of TDM-in-the-middle networks prevents the achievement of this goal. INCOMPAS and Alliance members have spent considerable time and resources implementing STIR/SHAKEN, efforts that are wasted when their signed calls fail to reach the terminating provider with the STIR/SHAKEN information intact.

The overall incidence of signed calls reaching the terminating provider with STIR/SHAKEN information remains unacceptably low. Pointing to TransNexus data, the Alliance noted in January 2023 comments that only about 24% of signed calls arrived at the terminating provider with SHAKEN information intact.[7] Although there has been some improvement, TransNexus reported that in October 2025, only 38.8% of calls arrive with SHAKEN information intact.[8] Measured against the standard of ensuring end-to-end conveyance of SHAKEN information, the STIR/SHAKEN framework does not appear efficacious.

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[7] Alliance September 23, 2023 Comments at 3-4. *See* TransNexus October, 2, 2022 Comments at 6 ("only 24% of calls received by terminating service providers have SHAKEN information.").

[8] *See STIR/SHAKEN statistics from October 2025*, TRANSNEXUS (Nov. 4, 2025), *available at* https://transnexus.com/blog/2025/shaken-statistics-october/ ("This makes four consecutive months in which the percentage of signed calls at termination has hovered around 38%. *We believe that this statistic reflects calls being routed over non-IP segments in the call path*, where the SHAKEN call authentication information is lost. We suspect that perhaps some authentication providers are deliberately routing calls over non-IP call segments to launder their identity from the calls they authenticated." (emphasis added)).

The primary cause for the failure of SHAKEN information to reach the terminating provider is not, however, some inherent flaw in the framework, but the presence of TDM networks in the call chain. This failure not only undermines the efficacy of STIR/SHAKEN, it also has competitive consequences. The largest carriers transmitting calls end-to-end on IP networks, either across their own networks or interconnecting with other major providers, are able to convey SHAKEN information. Smaller providers, however, are unable to provide similar protections for their customers given that they more often encounter TDM networks in the call chain.

To address the persistent failure of SHAKEN information to reach the terminating provider, and to ensure STIR/SHAKEN can operate effectively across all segments of the voice ecosystem, the Commission should take proactive steps to accelerate the transition to IP interconnection in an orderly fashion. Specifically, as part of its new proceeding on advancing IP interconnection, we urge the Commission to adopt a national IP interconnection policy that establishes a firm, reasonable deadline by which all voice providers must support IP-based call routing and signaling.[9] This policy should be phased in over time, with initial compliance

[9] *See Advancing IP Interconnection, Accelerating Network Modernization, Call Authentication Trust Anchor*, WC Docket Nos. 25-304, 25-208, and 17-97, Notice of Proposed Rulemaking, FCC 25-73 (rel. Oct. 29, 2025) (seeking comment on the current state of TDM and IP interconnection for voice services). To support effective implementation and address technical and operational challenges, the Commission could, in the alternative, convene a technical advisory committee or working group composed of stakeholders across the voice ecosystem to develop recommended standards and timelines for secure, scalable IP interconnection, ensuring that call authentication data, including both STIR/SHAKEN tokens and emerging forms of caller identity information such as Rich Call Data, is preserved from origination to termination.

obligations placed on high-volume transit and terminating providers, who are best positioned to drive meaningful improvements in call authentication performance.[10]

Finally, the Commission should enhance transparency and accountability by requiring voice service providers and their third-party analytics partners to report data on STIR/SHAKEN performance. Such reporting should include the percentage of signed calls received with valid SHAKEN information, identification of causes for any degradation or stripping of authentication data, and relevant call treatment outcomes. These metrics will provide the Commission and industry with a clearer picture of progress toward end-to-end authentication and will help identify where further regulatory or industry action is needed.

II. THE COMMISSION SHOULD FACILITATE CALLER ID AUTHENTICATION

As noted, the Commission previously declined to assess the efficacy of STIR/SHAKEN based on its ability to mitigate illegal traffic. The Commission appropriately explained in the *First Triennial Report* that the framework is simply one of a number of measures taken to reduce illegal robocalls. In part this is due to the inherent limitations of STIR/SHAKEN. While it can, when properly deployed, minimize illegal number spoofing and identify the originating provider (and thus assist tracebacks) the framework provides no information regarding the identity of the caller or the nature of the call.[11]

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[10] Competitive voice service providers, including members of INCOMPAS and the Alliance, will also be able to reinvest savings from the transition from legacy TDM to modern IP networks into expanding broadband and advanced network deployment, helping accelerate connectivity and innovation.

[11] When the SHAKEN information reaches the terminating network, the terminating provider or its analytics partner can use the information as one factor in determining call treatment, *e.g.,* whether to block or label the call.

Fortunately, industry also is moving forward with an extension of STIR/SHAKEN called Rich Call Data ("RCD"), which enables authentication not just of the number in caller ID, but the accurate identification of the caller.[12] Through this technological evolution of STIR/SHAKEN, originating providers are able to transmit not only authenticated caller ID numbers, but also verified caller name, branding information, and the purpose of the call to the called party. When received and displayed to the called party, this data enhances transparency, improves answer rates for legitimate businesses, and provides consumers with the information necessary to make informed decisions about incoming calls.

Current proprietary versions of this technology, commonly called branded calling, have been touted as successful in improving answer rates and helping to restore trust in the network. However, a multitude of proprietary solutions threatens to reduce uptake and splinter the mechanisms for verifying caller identity. Verifying the identity of the caller in the first instance is important to the improved efficacy of efforts to combat illegal robocalling and will require a widely-adopted trusted framework for ensuring that originating providers have vetted the caller. Fortunately, STIR/SHAKEN is a framework that is non-proprietary and already widely adopted in the United States, making it an optimal solution for verifying caller identity. We believe that RCD is an important extension of the STIR/SHAKEN framework and would further the goals of the TRACED Act. INCOMPAS and the Alliance welcome the Commission's exploration of RCD in the *Caller Identity FNPRM* and would urge the agency to specify that companies

[12] Signature-based Handling of Asserted Information Using toKENS (SHAKEN): Calling Name and Rich Call Data Handling Procedures, ATIS-100094.2, April 30, 2025 ("This specification expands the SHAKEN framework, introducing mechanisms for authentication, verification, and transport of calling name as well as other enhanced caller identity information (e.g., images, logos) and call reason, and describes how they are handled in various call origination and termination scenarios.").

supporting STIR/SHAKEN must also support a non-proprietary RCD mechanism through STIR/SHAKEN to ensure the broadest implementation of verifying caller identity information to called parties. INCOMPAS and the Alliance also encourage the Commission to examine methods by which international callers can participate in any caller identification framework or engage in branded calling solutions.

The Commission should promote interoperable, vendor-neutral solutions to avoid fragmentation and ensure broad industry adoption, require originating provider vetting obligations to confirm that the information transmitted via RCD is accurate and trustworthy, and clarify that full participation in the STIR/SHAKEN framework will ultimately include the ability to generate and transmit authenticated Rich Call Data.

Here too, transition to IP networks is critical. Just as caller ID authentication information is lost due to TDM networks, RCD—also contained in the SIP header—will be lost. Fostering RCD without simultaneously transitioning to IP networks will undermine the efficacy of caller identity authentication.

III. CONCLUSION

INCOMPAS and the Cloud Communications Alliance appreciate the Commission's continued commitment to evaluating and improving the STIR/SHAKEN framework as required by the TRACED Act. STIR/SHAKEN remains a promising and important tool in the fight to further mitigate illegal robocalls, and it is representative of how industry can modulate and address illegal robocalling in a standardized way. As our members' experience demonstrates, while STIR/SHAKEN has made meaningful progress in enhancing the authentication of caller ID information, its full potential remains unrealized due to critical structural barriers, most notably, the persistence of TDM interconnection and the lack of a uniform framework for verifying caller identity.

To achieve the goals envisioned by Congress, the Commission must take bold steps to modernize the nation's voice network infrastructure and build upon the current authentication framework. This includes adopting policies that accelerate the transition to IP interconnection, facilitating the deployment of Rich Call Data to enable verified caller identity, and ensuring that all providers, regardless of size or business model, can participate fully and equitably in the authentication ecosystem.

The upcoming triennial review presents an important opportunity for the Commission to chart a more effective and forward-looking course. By expanding the scope of its efficacy assessment and acting on the recommendations outlined above, the Commission can help ensure that STIR/SHAKEN evolves into a truly robust, inclusive, and technologically future-proof framework for call authentication. We urge the Commission to take these steps in the public interest and in furtherance of its statutory obligations under the TRACED Act.

Respectfully Submitted,

INCOMPAS

/s/ Christopher L. Shipley

Christopher L. Shipley
Executive Director of Public Policy
INCOMPAS
1100 G Street NW, Suite 800
Washington, DC 20005
cshipley@incompas.org

CLOUD COMMUNICATIONS ALLIANCE

/s/ Joe Marion

Joe Marion
President
Cloud Communications Alliance
131 NW 1st Avenue
Delray Beach, FL 33444
(561) 232-3891

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