



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

November 5, 2018

LeRoy T. Carlson, Jr.
TDS
30 N. LaSalle Street
Suite 4000
Chicago, IL 60602

Dear Mr. Carlson,

Stopping unwanted robocalls is the Commission's top consumer protection priority, and ending caller ID spoofing is essential to that effort. Caller ID spoofing enables scammers to defraud Americans and hide from law enforcement. The Commission has been pursuing solutions to this vexing problem through policymaking, enforcement actions, and collaborative efforts with other regulators and industry. For example, the Commission has issued forfeitures totaling more than \$200 million since 2017 for mass spoofing schemes in violation of the Truth in Caller ID Act. But to end Caller ID spoofing, we need a robust call authentication framework, in which providers "sign" calls to vouch for their authenticity.

The Commission and industry have made significant progress in developing a call authentication framework. The Internet Engineering Task Force, Alliance for Telecommunications Industry Solutions (ATIS), SIP Forum, and other organizations have worked for several years to develop the protocols and standards to authenticate and verify caller identification for calls carried over an IP network, resulting in a set of protocols known as Signature-based Handling of Asserted Information Using toKENs (SHAKEN) and the Secure Telephone Identity Revisited (STIR). In July 2017, the Commission issued the Call Authentication Trust Anchor Notice of Inquiry, seeking comment on the implementation and governance of the SHAKEN/STIR framework. In May 2018, the North American Numbering Council (NANC), an FCC federal advisory committee on numbering policy, issued recommendations on the SHAKEN/STIR system, including the selection criteria for a SHAKEN/STIR Governance Authority. NANC responded with a proposed timeline for adoption and deployment of SHAKEN/STIR in 2019. This summer, ATIS has convened a Governance Authority, which is currently moving forward in the creation and selection of the Policy Administrator. The Policy Administrator will apply the rules set by the Governance Authority and oversee the certification process.

Despite these industry-wide efforts, I understand from Commission staff that TDS does not yet have concrete plans to implement a robust call authentication framework. I hope that is no longer the case. Accordingly, I ask you to respond to the following questions:

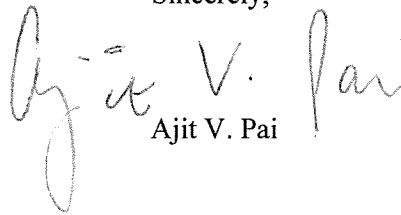
- What is preventing or inhibiting you from signing calls today?
- What is your timeframe for signing (i.e., authenticating) calls originating on your network?
- What tests have you run on deployment, and what are the results? Please be specific.
- What steps have you taken to work with vendors to deploy a robust call authentication framework?
- How often is TDS an intermediate provider, and do you intend to transmit signed calls from other providers?

- How do you intend to combat and stop originating and terminating illegally spoofed calls on your network?
- The Commission has already authorized voice providers to block certain illegally spoofed calls. If the Commission were to move forward with authorizing voice providers to block all unsigned calls or improperly signed calls, how would you ensure the legitimate calls of your customers are completed properly?

Please send your detailed response by November 19, 2018 by email to Deborah.Salons@fcc.gov and via the FCC's Electronic Comment Filing System in WC Docket No. 17-97. If you have any questions regarding this letter, please contact Deborah Salons in the Wireline Competition Bureau, Competition Policy Division, at (202) 418-0637 or Deborah.Salons@fcc.gov.

Thank you for your cooperation. It is a challenging task, but I'm confident that we can protect Americans from illegal spoofed robocalls if all of us work together.

Sincerely,



Ajit V. Pai