

# Ribbon Advisory Note on the FCC Sixth Report and Order



**Abstract:** *The FCC has issued the SIXTH REPORT AND ORDER regarding STIR/SHAKEN deployment in the US. The order proposes extending the intermediate provider authentication obligation and the Robocall Mitigation filing obligation. For the former, the order requires that the first intermediate provider must authenticate (i.e. sign) calls not already authenticated. For the latter, additional information must be provided in the filing, and providers with deficient filings may be removed from the database. Critically, it also proposes that the “Reasonable Steps” Mitigation Standard now apply to all providers. This change means that full implementation of STIR/SHAKEN by itself will no longer be sufficient to meet the FCC order.*

The negative consequences of unwanted and illegal robocalls remain the FCC’s top consumer protection priority. To address this, the FCC has issued multiple mandates and rulings related to the roll out of STIR/SHAKEN in the US. On March 17, 2023, the FCC released the SIXTH REPORT AND ORDER AND FURTHER NOTICE OF PROPOSED RULEMAKING.

This advisory note summarizes the important changes in that report as they apply to customers of Ribbon’s products and services.

- **Strengthening the Intermediate Provider Authentication Obligation**
  - Any non-gateway intermediate provider that receives an unauthenticated SIP call directly from an originating provider must now authenticate (i.e., sign and attach a STIR/SHAKEN Identity header) to the call. Note that this mandate only applies to the *first* intermediate provider in the call path.
  - Clarifies that providers are required to comply, at a minimum, with the version of the STIR/SHAKEN standards ATIS-1000074, ATIS-1000080, and ATIS-1000084 and all of the referenced documents in effect at the time of their compliance deadline. In particular, the FCC does not require that providers implement versions that came into effect after their compliance deadline, though it might be advantageous for the provider to do so.
  - Requires any provider subject to this obligation to either upgrade its network to use SIP and fully implement the STIR/SHAKEN framework or be ready to provide documented proof that it is participating in developing or testing a non-IP caller identification authentication solution.
  - Specifies a compliance deadline of December 31, 2023, for this new authentication obligation.
- **Mitigation and Robocall Mitigation Database Filing Obligations**
  - The “Reasonable Steps” Mitigation Standard now applies to all providers. Previously, this requirement only applied to providers that had *not* fully implemented STIR/SHAKEN. *This change is critical as it means that full implementation of STIR/SHAKEN by itself is not sufficient to meet the FCC mandate.*

# Ribbon Advisory Note on the FCC Sixth Report and Order



- By this standard, a provider's program is "sufficient if it includes detailed practices that can reasonably be expected to significantly reduce" the transport or origination of illegal robocalls.
- Expands the obligation to file a robocall mitigation plan along with a certification in the Robocall Mitigation Database to all providers regardless of whether they are required to implement STIR/SHAKEN.
- The Robocall Mitigation Database filing must describe how the provider is meeting the obligation, describe any "know-your-upstream-provider" procedures in place, and describe any systems and services they use to identify and block illegal traffic. *For the last point, if the provider uses Ribbon's Call Trust® products or services, they must indicate as such and specifically name Ribbon in their filing.*
- Additional Information must be Submitted with Mitigation Plans relative to previous requirements. Even if a provider has already made a filing, it is likely that the filing will need to be updated with the additional required information.
- Expedited removal process from Robocall Mitigation Database for filings that are "facially deficient," i.e., does not include the specific steps being taken to reduce robocalls. Note that removal from database requires blocking of all provider calls by downstream peers, so proper filing in the database is critical.
- Providers newly subject to the filing obligations must submit a filing by the later of: (1) 30 days following publication in the Federal Register; or (2) any deadline set by the Wireline Competition Bureau through Public Notice.

Ribbon wishes to reiterate the point that full implementation of STIR/SHAKEN by itself is *no longer sufficient* to meet the FCC orders. Some additional defined plan, process, products, or services that can reasonably be expected to reduce transiting or originating robocalls is required. Furthermore, this implementation must be specified in the Robocall Mitigation Database. Ribbon's Call Trust® products and services for call reputation scoring and call treatment is one way of satisfying these additional FCC requirements. Please contact your Ribbon account team or reseller for further information.

This note is informational only and is not legal advice as to a service provider's obligations with respect to the FCC order. The reader is referred to the original order at

<https://docs.fcc.gov/public/attachments/FCC-23-18A1.pdf> for additional details.