SIMPLIFYING TRACED ACT COMPLIANCE

Communications Service Providers (CSPs) may be confused about the recent series of FCC Reports and Orders, and Public Notices, concerning exactly what they need to do to comply with STIR/SHAKEN and robocall mitigation mandates. If you have a 2020 FCC 499-A Form on file with the Federal Communications Commission (FCC), and have an Operating Company Number (OCN), we've broken it down for you here.

DID YOU RECEIVE AN FCC EXTENSION TO IMPLEMENT STIR/SHAKEN CALL AUTHENTICATION?

YES, I RECEIVED AN EXTENSION BECAUSE MY ORGANIZATION:

- Has less than 100k lines: two-year extension to implement STIR/SHAKEN

- Received a 214 discontinuance: one-year extension to implement STIR/SHAKEN

- Was unable to obtain a STIR/SHAKEN token: On May 11, 2021, many carriers (VOIP Providers) who were not able to obtain a token were given the ability to do so. No exact date has been given yet for those extensions, only that carriers should diligently pursue a certificate so they can implement STIR/SHAKEN.

- Or, a portion of my network does not support SIP: so I need to implement a robocall origination program to stop calls from originating from my network. The extension date to implement STIR/SHAKEN is not specified.

Those CSPs that have taken an extension will still eventually need to implement STIR/SHAKEN according to the criteria of the extension.

HERE'S WHAT YOU MUST DO IF:

IF YOU TOOK AN EXTENSION

By June 30, 2021: implement a Robocall Mitigation program to stop robocalls from originating from carrier network and document that in the FCC's new Robocall Mitigation Database.

- If applicable, submit additional information with certifications that some or all of the calls you originate are subject to a robocall mitigation program to include:
- The type of extension or extensions received under section 64.6304 of the FCCs rules
- Specific steps taken to avoid originating illegal robocalls
- A commitment to respond to traceback requests and to cooperate with investigating and stopping illegal robocalls.[i]

NO, MY ORGANIZATION WASN'T GRANTED AN EXTENSION

- **By June 2021**: Implement STIR/SHAKEN.
- **By June 2021**: Register in the FCC Robocall Mitigation Database and certify that your traffic is either fully, partially, or not yet signed with STIR/SHAKEN.[ii]

All certifications must be signed by an officer in conformity with the FCC's Rules and Regulations for Title 47, section 1.16.14. CSPs must also submit any necessary updates to the information they filed in the certification process within ten business days.

Consequences of non-compliance: other carriers are prohibited from accepting your calls as of September 28, 2021.

Neustar's Robocall Mitigation solution works alongside STIR/SHAKEN call authentication to identify unauthorized and suspicious use of phone numbers and detect trends and anomalies in calling patterns for both originating and terminating calls.

LEARN MORE   Visit our STIR/SHAKEN Resource Hub to learn about insights, resources, and solutions.

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