

Revocation of STI Service Provider Code tokens

This policy describes how and why STI Service Provider Code (SPC) tokens may be revoked.

Background. The STIR/SHAKEN framework is an industry-led initiative designed to help mitigate illegal and unwanted caller ID spoofing and robocalling. It is the role of the Secure Telephone Identity Governance Authority (STI-GA) to manage the ongoing operations of the framework. The STI-GA Board, a body composed of a diverse set of telecommunications industry participants, sets the policy for the overall framework.

Within the SHAKEN framework, a service provider (SP) will apply to the Secure Telephone Identity Policy Administrator (STI-PA) for a Service Provider Code (SPC) token, the assignment of which will allow the SP to apply to an approved Secure Telephone Identity Certification Authority (STI-CA) for the SHAKEN certificate the SP needs to sign calls with the proper level of attestation. In other words, it is the SPC token that allows the SP to obtain certificates to sign calls within the STIR/SHAKEN ecosystem managed by the STI-GA. Without a valid SPC token, an SP will be unable to sign calls with a certificate accepted in this ecosystem.

If eligible to receive an SPC token, the SP will be required to execute an agreement explaining the terms under which this token may be used. Misuse of the token or failure to comply with important policies and other safeguards could jeopardize the integrity of the STIR/SHAKEN ecosystem. For this reason, the SP Agreement requires compliance with these policies and safeguards:

Service Provider shall only use SPC tokens for the intended purposes as set forth in the Participant Agreement and the ATIS SHAKEN Specifications and in compliance with all requirements of such specifications. Service Provider agrees not to sign any telephone calls that do not meet the levels of attestation in the relevant ATIS SHAKEN Specifications.

This agreement also establishes that the STI-PA “may revoke Service Provider’s access to SPC tokens and/or revoke existing tokens immediately upon indication that Service Provider is in breach of this Agreement.”

Reasons for Revocation. An SPC token may be revoked for the following reasons:

- Compromised credentials: the token’s private key has been lost, stolen, or compromised, or the certificate authority has been compromised.
- The SP exits the ecosystem and closes their account with the STI-PA.

Only in the case below would the STI-GA managed revocation process take effect:

- The SP failed to adhere to one or more of the policy and/or technical requirements:¹
 - SPC token Access Policy
 - Funding requirements²

¹ <https://sti-ga.atis.org/wp-content/uploads/2020/04/200211-STIGA-Board-Policy.pdf>.

² As specified in the STI Participant Agreement (https://sti-ga.atis.org/wp-content/uploads/2020/04/STI-PA_Service_Provider_Agreement.pdf).

- SHAKEN specifications³
- When directed by a court, the FCC, or another body with relevant legal authority due to a violation of Federal law related to caller ID authentication.

Who Has Authority to Revoke SPC tokens? Revocation is to be performed by the STI-PA at its own discretion in some well-defined instances, or as directed by the STI-GA.

- STI-PA. The STI-PA is primarily responsible for revoking SPC tokens in the case of compromised credentials, or when an entity is exiting the ecosystem. In either of these instances, there is no question as to whether a SPC should be revoked. The STI-PA may also revoke tokens as directed by the STI-GA.
- STI-GA. The STI-GA oversees all revocations other than those for compromised credentials or for when an entity is exiting the ecosystem. The STI-GA retains the right to review all STI-PA revocations.

SP Issue Identification. The first step is the proper identification of an issue that could lead to revocation. Information regarding the need for revocation may come from an SP, the STI-PA, an STI-CA, or a regulatory agency, but in all cases it should be delivered to the STI-GA by a standardized reporting process.

- Reports from STI-CA and SPs. To ensure that all relevant information is provided and to facilitate the submission of reports, reporting entities should use the STI SPC token Complaint Submission Form.⁴ To facilitate the identification of potential problems, an online version of this complaint form will be established. This form is to be used by entities approved to operate in the SHAKEN ecosystem to report on potential behavior contrary to that defined in the STIR/SHAKEN specifications, or STI-GA policies.
- Reports from the STI-PA. The STI-PA may seek revocation either for non-payment, or after becoming aware of SP behavior contrary to that defined in the STIR/SHAKEN specifications, or STI-GA policies. In either case, the STI-PA should present this information to the STI-GA via the standardized reporting process, the STI SPC token Complaint Submission Form.
- Reports from the STI-GA. Information on issues related to the use of SPC tokens may also come to the attention of one or more members of the STI-GA Board or ATIS staff. This information should be presented to the STI-GA via the STI SPC token Complaint Submission Form completed by the party wishing to present the complaint.
- Reports from Regulatory Authorities (e.g., FCC/FTC). Regulatory authorities may become aware of SP behavior contrary to that defined in the STIR/SHAKEN specifications, STI-GA policies, or applicable rules or laws. The regulatory body should submit their request for SPC token revocation to the STI-GA in writing but does not necessarily need to use the standardized format. The regulatory authority may do so through contact with the STI-GA Director, STI-GA Board Chair, or Vice-Chair.

³ ATIS-1000074, ATIS-1000080, and ATIS-1000084.

⁴ See Attachment A.

- Reports from Consumers/other Third Parties. Complaints from end users or those entities outside the STIR/SHAKEN ecosystem should continue to be filed with their SP, or the appropriate regulatory authority. A set of FAQs on the STI-GA website will explain to whom consumers and others should direct STI-related inquiries.⁵

STI SPC token Complaint Submission Form. At a minimum, the following data should be collected about a complaint:

- Name of complainant including contact information
- Name of party against which claim is submitted
- Nature of complaint and supporting information
- Acknowledgment that data may be passed to appropriate regulatory authority (FCC/FTC)

The STI SPC token Complaint Submission Form (Form) will be hosted on the STI-GA website and available via a link on both the STI-GA and STI-PA websites. Once filled out, the Form will submit via email directly to STI-GA.

Revocation Process. The following steps outline the revocation process:

1. The STI-GA will log the complaint and perform a pro forma review of the Form to determine if the information provided is sufficient to begin a formal review process.
2. The STI-GA will first inform the complainant of the decision related to its complaint if the decision is to not move forward with an investigation.
 - a. The STI-GA will not act on complaints that are anonymous or do not provide adequate information.
3. If it has been determined by the STI-GA that sufficient information has been provided by the complainant, notice of the complaint will be sent to the STI-GA Board.
4. Following STI-GA Board receipt of notice, a second notice will be sent to complainant and to all involved in the investigation process as to the confidentiality of the forthcoming proceedings.
 - a. Ensures protection of confidential data supplied to the STI-GA, STI-PA, Technical Committee (TC), and STI-GA Board.
 - b. Ensures news of STI-GA investigation of the complaint is not shared outside STI-GA circles.
 - c. Timeframe from receipt of complaint for which adequate information has been provided is seven (7) business days.
5. STI-GA sends notice of complaint to the subject of the complaint to solicit feedback.
 - a. A preliminary response from the subject of the complaint is due to the STI-GA within five (5) business days.
6. STI-GA sends a copy of the complaint to STI-PA.
7. STI-PA will provide the STI-GA with further information on facts surrounding the complaint, consulting with the STI-CA where necessary, along with a proposed recommendation within two (2) business days.

⁵ See Attachment B.

- a. Information from STI-PA should include:
 - i. Current registration status of all companies involved in complaint (valid registration, how long, number of SPC tokens, CA used).
 - ii. Any information about complaint subject certificate usage from STI-CA, if relevant.
 - iii. Any other relevant information.
8. The STI-GA Board will be provided a summary update with a proposed recommendation on moving forward with the complaint review.
9. The STI-GA Board will either reject complaint review or, at the discretion of the Board, assign further review of the complaint to the TC.
 - a. The STI-GA will notify complainant of review rejection with explanation.
10. If the STI-GA Board agrees complaint review is necessary, the STI-GA reaches out to the entity that is the subject of the complaint.
 - a. Provides notification of complaint being investigated.
 - b. Requests substantive written response within TBD.
11. If the STI-GA Board has determined that TC review is required, the STI-GA aggregates all complaint information and sends to TC.
 - a. The TC will review and provide a recommendation to the STI-GA Board in a timely manner.
12. If required, the TC recommendation will be sent to the STI-GA Board for consideration/approval.
 - a. The STI-GA Board may opt for further investigation/discussion of the complaint.
 - i. Potentially submit questions to entities involved in the process (SPs, STI-PA, STI-CA, TC, STI-GA).
 - b. A two-thirds vote is required for revocation.
 - c. This will be done in a timely manner.
13. The STI-GA Board decision on revocation is transmitted to service provider, complainant, and STI-PA.
14. The STI-PA shall deactivate the SP account and notify all STI-CAs of the revocation of the SPC token. STI-CAs will ensure any certificates granted to the SP are added to the Certificate Revocation List and will not assign any new certificates to that SP until they can provide a valid SPC token from the STI-PA.
15. The STI-GA should allow an appropriate timeframe for the subject entity of the complaint to appeal the STI-GA Board decision.
 - a. Appeal will follow the Formal Appeals process outlined in Section XI of the STI-GA Operating Procedures.
16. Following the finalization of the decision:
 - a. The STI-GA Board may also wish to consider:
 - i. Referral of the complaint to the appropriate regulatory agency.
 - ii. Any STI-GA Policy additions or clarifications needed as a result of its finding.
 - b. The STI-GA Board will post the decision publicly.

Attachment A

STI SPC token Complaint Submission Form

Does the company [subject of the complaint] file a 499A report with the FCC? If not, please see FAQs related to issue reporting for non-STI participants.

Complainant Information

Company Name:

Individual Responsible for Complaint:

Contact Address:

Contact Email:

Contact Phone:

Information on Subject of Complaint (if known)

Company Name:

Contact Address:

Contact Email:

Contact Phone:

Nature of Complaint (Please provide a detailed description of the issue as well as any supporting information. The STI-GA will reject all complaints lacking sufficient supporting rationale.)

Please check to acknowledgment your understanding that all data provided by you may be passed to the appropriate regulatory authority (FCC/FTC) at the discretion of the STI-GA.

Attachment B

Frequently Asked Questions

- 1) I am a service provider not registered with STI-PA and I have a complaint about STIR/SHAKEN Caller ID Authentication. Who do I call?
 - a. The first option is to reach out to your wholesale provider if you have any questions or issues with how they are signing calls. You may also file a complaint with the [Federal Communications Commission](#) or [Federal Trade Commission](#).

- 2) I am a consumer and I have a complaint about Caller ID Authentication. Who do I call?
 - a. The first option is to reach out to your telephone service provider if you have any questions or issues with calls you are receiving. You may also file a complaint with the [Federal Communications Commission](#) or [Federal Trade Commission](#), or your state's [Attorney General](#).