

STI-GA Policy Decisions Document

Policy Decision 1: SPC Token Access Policy

In order to obtain the Secure Telephone Identity (STI) certificates they will use to sign calls, i.e. authenticate Caller ID, from an approved STI Certificate Authority (CA), service providers must first apply to the STI Policy Administrator (PA) to acquire a Service Provider Code (SPC) token. The STI-PA will vet each service provider applicant against rules set by the STI Governance Authority (GA). The STI-GA Board has determined that, to be cleared by the STI-PA for access to the STI certificates, an entity must meet the following criteria:

- 1) Have a current form 499A on file with the FCC
- 2) Have been assigned an Operating Company Number (OCN)
- 3) Have direct access to telephone numbers from the North American Number Plan Administrator (NANPA) and National Pooling Administrator (NPA) ¹

The above SPC token Access Policy will be in place until the following revised SPC token Access Policy is in effect:

SPC token Access Policy, Revised November 3, 2020

- 1) Have a current form 499A on file with the FCC
- 2) Have been assigned an Operating Company Number (OCN)
- 3) Have certified with the FCC that they have implemented STIR/SHAKEN or comply with the Robocall Mitigation Program requirements and are listed in the FCC database.²

This policy will be reviewed at least on a quarterly basis, or as requested by the STI-GA.

Timing

- The new policy will be effective on the FCC's Robocall Mitigation Program Certification Filing Deadline. Until then, the current policy will remain in effect.
- FCC Call Authentication Second Report & Order directs the Wireline Competition Bureau to release a Public Notice no earlier than March 30, 2021, announcing the creation of both a portal and a database for SPs to file their certifications with a filing deadline no earlier than June 30, 2021.
- Service Providers that have already obtained SPC tokens under the current policy must meet the criteria within 30 days of the FCC certification filing deadline or risk having their tokens revoked.

¹ While the access limitation is reasonable, signing a given call should not be limited to only the pool of numbers available to the provider via direct access. In other words, per ATIS-100074, 5.2.3, under correct conditions a qualified service provider (SP) must be allowed to sign leased numbers as well as other numbers belonging to an OCN not assigned to that qualified SP insofar as the SP can properly verify the customer's authorized use of that number.

² See FCC 20-136 at paragraph 93

Policy Decision 2: 2020 Funding

The STI-GA Board of Directors unanimously voted on a method for determining a service provider's calendar year fee for obtaining a token to be used as part of the STI-GA call authentication ecosystem:

- The fee is based on a providers' revenue as detailed on the provider's Telecommunications Reporting Worksheet, FCC Form 499-A, and is calculated by applying a contribution factor of 0.0000385 to the amount reported on Form 499-A Revenue Lines 423 or 514 (column A), whichever is greater.
 - If the SP files more than one Form 499A for different affiliates or subsidiaries, it should total the amounts on all forms filed. It will add up all the revenues reported among all its filed forms on lines 423. It will also add up all the revenues reported among all its filed forms on line 514. It will then report the larger of the two numbers to the STI-PA. It is this total revenue figure to which the contribution factor will be applied to determine the payment.
- Minimum and maximum 2020 fees have been established:
 - Maximum 2020 fee -- \$240,000
 - Minimum 2020 fee -- \$825
- Fee information will be collected as part of the [online registration process](#). Revenue information will be used by STI-PA only for the purposes of determining fees for joining the STI framework. The STI-PA will not share this information with anyone, including ATIS, any ATIS member, any successor governance authority, or any Policy Administrator affiliate or parent. An SP that does not provide the required 499A data will be assessed the Maximum 2020 fee by default.
- Calendar year fees will not be prorated.

Policy Decision 3: 2021 Funding

The STI-GA Board of Directors unanimously voted on a method for determining a service provider's calendar year fee for obtaining a token to be used as part of the STI-GA call authentication ecosystem:

- The fee is based on a providers' revenue as detailed on the provider's Telecommunications Reporting Worksheet, FCC Form 499-A, and is calculated by applying a contribution factor of 0.0001821 to the amount reported on Form 499-A Revenue Lines 423 or 514 (column A), whichever is greater.
 - If the SP files more than one Form 499A for different affiliates or subsidiaries, it should total the amounts on all forms filed. It will add up all the revenues reported among all its filed forms on lines 423. It will also add up all the revenues reported among all its filed forms on line 514. It will then report the larger of the two numbers to the STI-PA. It is this total revenue figure to which the contribution factor will be applied to determine the payment.

- Minimum and maximum 2021 fees have been established:
 - Maximum 2021 fee -- \$283,950
 - Minimum 2021 fee -- \$825
- Fee information will be collected as part of the [online registration process](#). Revenue information will be used by STI-PA only for the purposes of determining fees for joining the STI framework. The STI-PA will not share this information with anyone, including ATIS, any ATIS member, any successor governance authority, or any Policy Administrator affiliate or parent. An SP that does not provide the required 499A data will be assessed the Maximum 2021 fee by default.
- Calendar year fees will not be prorated.