



Federal Communications Commission  
Washington, D.C. 20554

August 14, 2023

The Honorable Karen Charles  
Commissioner, Massachusetts Department of Telecommunications and Cable  
Chairwoman, North American Numbering Council  
1000 Washington Street, Suite 600  
Boston, MA 02118

**Re: Call Authentication Trust Anchor Working Group**

Dear Chairwoman Charles:

Fighting illegal robocalls continues to be the Commission's top consumer protection priority. The Wireline Competition Bureau (Bureau) would like to thank the North American Numbering Council (NANC) and the Call Authentication Trust Anchor (CATA) Working Group for your valuable assistance in these efforts. Your past contributions have had a significant impact on the Commission's ongoing work to combat the scourge of illegal robocalls.

The Bureau again requests the NANC's help in addressing a critical issue regarding illegal robocalls recently identified by the Commission. Specifically, we direct the NANC to issue a report, no later than **June 28, 2024**, on the regulatory treatment of international cellular roaming traffic (i.e., traffic originated abroad from U.S. mobile subscribers carrying U.S. North American Numbering Plan numbers and terminated in the U.S.).

In the *Fifth Caller ID Authentication Further Notice*, the Commission sought comment on stakeholders' assertions that international cellular roaming traffic is unlikely to carry illegal robocalls and therefore should be treated differently under our rules from other voice traffic.<sup>1</sup> As part of that inquiry, the Commission also asked whether any "lighter touch" regulatory regime for such traffic could be exploited by illegal robocallers disguising their traffic as cellular roaming traffic.<sup>2</sup>

The record in response to the inquiry was limited, and the few parties that addressed these issues disagreed as to whether differential treatment of international roaming traffic is appropriate. Given the limited record, particularly with respect to whether and how providers could readily identify or segregate

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<sup>1</sup> See *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Sixth Report and Order, Fifth Report and Order, Order on Reconsideration, Order, Seventh Further Notice of Proposed Rulemaking, Fifth Further Notice of Proposed Rulemaking, FCC 22-37 at 87, para. 225 (2022) (*Fifth Caller ID Authentication Further Notice*).

<sup>2</sup> See *id.*

such traffic for differential treatment, the Commission, in its *Sixth Caller ID Authentication Order*, directed the Bureau to refer the issue to NANC for further investigation.<sup>3</sup>

In response, the Bureau directs the NANC to address, at a minimum, the following topics in its report:

- Identify whether and to what extent international cellular roaming traffic is less likely to carry illegal robocalls than other traffic.
- Identify whether it is technically feasible for providers to segregate or otherwise clearly identify legitimate international cellular roaming traffic for compliance purposes and, if so, by what means. As part of this inquiry, analyze:
  - Whether such segregation or identification is already occurring and, if so, how widespread the practice is and under what circumstances it typically occurs; and
  - Any burdens or barriers to providers identifying or segregating such traffic, including whether those burdens or barriers vary based upon the size of the domestic provider receiving traffic or other factors.
- The extent to which other countries have anti-robocall or other regulatory regimes in place that require or rely on the segregation or identification of international cellular roaming traffic or that regulate such traffic differently, and the benefits and burdens associated with these foreign regulatory approaches.<sup>4</sup>
- Provide recommendations as to whether and, if so, how the Commission should modify its call authentication and/or robocall mitigation rules to account for international cellular roaming traffic. As part of this inquiry:
  - Evaluate the likely benefits and costs associated with any recommended approaches;
  - Analyze whether it would be technically feasible for illegal robocallers to disguise traffic as cellular roaming traffic in order to take advantage of any “lighter touch” regulatory regime for such traffic adopted by the Commission; and
  - Provide recommendations regarding any steps that the Commission and industry could take to prevent illegal robocallers from exploiting any such modifications to the Commission’s robocalling rules.
- Provide an analysis of whether, and if so, how, the segregation or identification of international cellular roaming traffic would affect the ability of gateway providers to authenticate such traffic using STIR/SHAKEN.

If you have questions about this referral, please contact Christi Shewman, the NANC’s Designated Federal Officer, at [christi.shewman@fcc.gov](mailto:christi.shewman@fcc.gov). We appreciate the NANC’s commitment to and continuing

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<sup>3</sup> *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18, at 43, para. 85 (2023) (*Sixth Caller ID Authentication Order*).

<sup>4</sup> For example, in the United Kingdom, Ofcom has provided guidance indicating that providers should block calls with UK calling line identification that originate outside of the UK for termination into the UK except in certain circumstances, which include “UK mobile users roaming overseas making calls back to UK numbers.” Ofcom, *Guidance on the Provision of Calling Line Identification Facilities and Other Related Services*, 11 (Nov. 15, 2022), [https://www.ofcom.org.uk/data/assets/pdf\\_file/0021/247503/CLI-guidance-annex.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0021/247503/CLI-guidance-annex.pdf).

work protecting American consumers and businesses from illegal robocalls and the harms they produce.

Sincerely,

A handwritten signature in blue ink, appearing to read "Trent Harkrader". The signature is fluid and cursive, with a long horizontal stroke at the end.

Trent Harkrader  
Chief  
Wireline Competition Bureau