

January 27, 2020

VIA Intervention Comment Form

Mr. Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mr. Doucet,

Subject: Telecom Notice of Consultation CRTC 2019-57: Compliance and Enforcement and Telecom Notice of Consultation CRTC 2019-404: Call for comments – Authentication/verification measures for caller identification for IP-based voice calls – Implementation of STIR/SHAKEN framework

1. The Canadian Communication Systems Alliance (“CCSA”) speaks for independent communications distributors – smaller broadcasting distribution companies, telephone companies and ISPs – across Canada. CCSA represents more than 110 companies operating from sea to sea to sea, including across the North.
2. CCSA has had the opportunity to review, in draft, the comments of the Independent Telecommunications Providers Association (“ITPA”) in this matter. CCSA agrees with and fully supports the ITPA’s submissions.
3. In addition to almost all of ITPA’s members, which operate as Type I CLECs, CCSA’s membership includes a number of small, Type IV CLECs which, by definition, rely on underlying LECs for connection to the PSTN and associated services.
4. CCSA agrees with ITPA that “nuisance calls are an important issue for the industry and Canadians and that the implementation of the STIR/SHAKEN protocols will have value in addressing this issue”.
5. The small TSPs that CCSA represents are investigating what is required to implement STIR/SHAKEN but many do not, at this time, have solutions defined. In fact, the technical solutions, the associated costs and the timetables for availability of vendor solutions differ according to the individual TSP’s underlying carrier’s capabilities and their own installed technology.

6. Each small TSP's case will differ depending on services – in particular the availability of SIP IP interconnection – available from the TSP's underlying carrier and the nature of the switching facility the TSP currently operates.
7. A number of CCSA members are in the process of assessing the retrofit costs to be able to comply with the standards. CCSA members are trying diligently to find the solutions which are appropriate for them. However, the process is time-consuming and solutions generally are not yet well-defined.
8. CCSA members continue to be concerned about the potential costs of implementing these solutions, especially due to the fact that there will be no off-setting retail revenue streams. They share the same practical concerns expressed by the ITPA, namely with:
 - the current unavailability of hardware and software from vendors, a situation over which they have no control;
 - the lack of IP interconnection with surrounding interconnecting carriers, a situation over which they have no control; and
 - existing switching facilities that do not support the ATIS solution.
9. CCSA appreciates the importance the Commission places on the protection of Canadians through widespread implementation of the STIR/SHAKEN protocols. However, CCSA shares ITPA's concern with the use of s. 24 and 24.1 of the *Telecommunications Act*, which would make compliance with STIR/SHAKEN a condition of providing service.
10. CCSA shares ITPA's concern that "should a small service provider not implement STIR/SHAKEN by the Commission's deadline, it would violate the Commission's condition and therefore potentially suffer any number of consequences imposed by the Commission ranging from potentially no longer being permitted to offer services to its customers, suffering administrative monetary penalties or even disconnection."
11. Accordingly, CCSA, like ITPA, objects to the Commission's proposal to require TSPs to implement the STIR/SHAKEN framework to authenticate and verify caller ID information for IP-based voice calls as a condition of providing telecommunications services.
12. Again, CCSA's small TSP members are working diligently to find the solutions that will work for them. CCSA members recognize the importance of the protections that the STIR/SHAKEN protocol will provide to their customers. What they need is time to find the solutions that they can reasonably implement.
13. For those reasons, CCSA respectfully requests that such small TSPs be granted an extension of the implementation deadline to September 30, 2021.

14. For the same reasons, CCSA also requests extension of the February 24th deadline for submission of implementation action plans¹ by six months to permit small TSPs to further investigate possible solutions.
15. CCSA thanks the Commission for the opportunity to provide these comments.

Sincerely,



Christopher J. Edwards
Vice-President, Regulatory Affairs

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¹ Compliance and Enforcement and Telecom Decision CRTC 2019-402, “CISC Network Working Group – Status of implementation by telecommunications service providers of authentication/verification measures for caller identification”, at para. 31.