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| All commenters should use this form when submitting comments on an ATIS Letter Ballot ([view the instructions](http://www.atis.org/01_resources/docs/LB/ATIS_LB_CCRPreso.pdf)). ­This form should accompany the [letter ballot (via ATIS Workspace)](http://www.atis.org/01_aws/faqs.asp#Ballot) and will subsequently be used during comment consideration by the appropriate committee/subcommittee. The commenter should use the “track changes” feature when recommending changes to existing text. Proposed changes to a table, figure, or any other item that is not purely text, should include a summary in the table below and provide the modified table, figure, etc., in the “Other Information” section. The source file for any new figures (Visio, PowerPoint, etc.) must also be included (by either zipping together with this document, or embedding as a file/object). |

## Letter Ballot: [PTSC-LB-248]

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| **Company Name: [Comcast]** |
| **TO BE COMPLETED BY COMMENTER** | **TO BE COMPLETED BY SUB/COMMITTEE** |
| **Auto#** | **Page/Section/Line #** | **Comment** | **Rationale/Suggested Solution** | **Type[[1]](#footnote-1)** | **Res.**[[2]](#footnote-2) | **Discussion/Explanation/Note *(if comment is modified, accepted/modified via a separate ballot comment, or not accepted)*** |
|  | Lines 407 to 409 | This paragraph implies a difference among the sub-options which doesn’t really exist. For all three sub-options, the end entity cert does chain to the trusted root cert of an STI-CA.The differences in how certs are obtained is covered in 2nd paragraph, therefore suggest removing the text after the semi-colon. | Recommended update…For all three sub-options – Delegate Certificates, Enterprise Certificates, and Lemon Twist – the originating enterprise entity obtains an STI certificate that chains to the trusted root certificate of an approved STI-CA.  | NS | A |  |
|  | Lines 423 to 424 | The “For delegated certificates…” sentence seems to be introducing a new topic, when in fact it’s a continuation of the previous sentence.  | Recommended Update: “The STI-PA sits at the top of this hierarchy, where it vets the identity of the TNSP, and authorizes the TNSP to obtain a CA-level certificate from the STI-CA that the TNSP can then use to issue STI delegate certificates to its enterprise customers.”  | NS | A |  |
|  | 428 to 434 | The text starting with “In the case of Delegated Certificates….” through the end of the paragraph is somewhat redundant to the text earlier in the paragraph.   | Suggest removing “In the case of Delegated Certificates….” through to the end of the paragraph. | NS | A |  |
|  | Lines 437 to 439. | The sentence “For the Delegate Certificate and Lemon Twist sub-options…” does not apply to Lemon Twist certificates, since the certificate scope does not identify TNs.  | Suggested Update: Change sentence to “For the Delegate Certificate model, the scope of authority of the certificate (as indicated by the certificate’s TN Authorization List) identifies the specific set of TNs that the originating enterprise entity is authorized to use.” | NS | A |  |
|  | Lines 444 to 445 | The word “also” in this sentence …“The Lemon-Twist solution also includes an enterprise ID in the SPC token that uniquely identifies the enterprise that is authorized to use the TNs.” … implies that there is other scope information in the token (like TNs) which is not the case.  | Remove “also” as follows…“The Lemon-Twist solution includes an enterprise ID in the SPC token that uniquely identifies the enterprise that is authorized to use the TNs. Verifiers can use this identifier to query an external TN-assignment database in order to validate that the enterprise is authorized to use the calling TN.” | NS | N |  |
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**Other Information (e.g., Tables, Figures):**

## Letter Ballot: [PTSC & PTSC-LB-248]

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| **Company Name: [Charter Communication]** |
| **TO BE COMPLETED BY COMMENTER** | **TO BE COMPLETED BY SUB/COMMITTEE** |
| **Auto#** | **Page/Section/Line #** | **Comment** | **Rationale/Suggested Solution** | **Type[[3]](#footnote-3)** | **Res.**[[4]](#footnote-4) | **Discussion/Explanation/Note *(if comment is modified, accepted/modified via a separate ballot comment, or not accepted)*** |
|  | Pg 1/1. & elsewhere | Global change – replace all occurrences of “section” with “clause”.  | editorial | NS | A | Prefer use of term Section |
|  | Pg 1/1. | Expand Acronyms – SHAKEN, EV, TNSP  | editorial | NS | A |  |
|  | Pg 1/ 1. | Line 5-6: “TN Letter of Authorization (LOA)” Should be “TN Letter of Authorization (TNLoA)” | editorial | NS | A |  |
|  | Pg 1/ 1. | Line 18: “TN Letter of Authorization (LOA)” Should be “TNLoA” | editorial | NA | A |  |
|  | Pg 1/ 1. | Replace “matter of Originating Service Provider local policy” with “matter of OSP, TNSP and Enterprise local policy” | Clarification not just OSP policy | NS | AM | OSP must make determination at call time. Not TNSP and enterprise. All three must agree on mechanism but OSP makes decision |
|  | Pg 1,/1. | At end of section add: “Note for a given call the same mechanism needs to be supported by the OSP, TNSP, and enterprise.” | Clarify need 3 entities to support the same mechanism for it to work. | NS | A |  |
|  | Pg 1/2. | “originating service provider (OSP)” should be “OSP” | editorial | NS | A |  |
|  | Pg 2/ 3. | Expand Acronym “SPs” | editorial | NS | A |  |
|  | Pgs 2/ 3. and elsewhere | Replace all occurrences (after 1st occurrence in section 1) of originating SP” or “originating service provider” “with “OSP” | editorial | NS | A |  |
|  | Pgs 2/3. | Include the full text from ATIS 1000074 on Full Attestation including the 2 Notes | Important since text from Note 2 is very relevant to this report | NS | A |  |
|  | Pg 2/4. | Add References to ATIS 1000074 & the 5 IPNNI contributions referenced in Annex A. Also need to verify referencing latest version of these documents.And replace “standards indicated below” with “documents indicated below” | Editorial  | NS | AM | Modified to include standards and documents. ATIS 1000074 is a standard and the rest are documents |
|  | Pg 3/5.1 | Delete 1st paragraph defining Authoritative Directory  | Term is not used | NS | AM | Add authoritative registry term to Section A.3. Central TN database |
|  | Pg 3, 5.1 | Expand 1st occurrence of Acronyms: ID, VoIP, PBX, and TSPAnd delete “(TSP)” on line 129 | Editorial (TSP 1st use on line 128) | NS | A |  |
|  | Pg 4/5.2 | Add Acronyms rcd, UNI, SPC, PSTN, & IDDelete Acronym LOA  | Editorial Note all occurrences of LOA removed by other proposed changes – e.g. replacing TN LOA with TNLoA | NS | A |  |
|  | Pg 4/6. | Delete Item 2 | It is not an enhancement if already covered by standards | NS | AM | Changed enhancement to modification. Principal is that mechanism should not require changes to framework specifications. |
|  | Pg 5/6. | Item 5 delete “for industry traceback purposes” | Audit is to verify allowed to use TN (i.e. full attestation) not for traceback (since a TN could be used by multiple enterprises) | NS | A |  |
|  | Pg 5/7. | Delete Section 7 | Section has no value | NS | AM | Section 7 deleted but contents moved into intro part of Section 8 |
|  | Pg 6/8.1Pg 7/8.2Pg 8/8.3Pg 9/8.4 | Delete item 4 & Replace item 3 with:“3) OSP B adds a SIP Identity header field with a SHAKEN PASSporT and setting Attestation to “B” or if dictated by Local Policy (e.g., by business agreement) to “A”.” | Current text in item 3 implies B must always be assigned in this case. Item 4 is not needed for this document and adds no value. | NS | AM | Each use case attempts to highlight the issues with Attestation. Provided proposed text (or if indicated by Local Policy….) in intro of Section 8 (now 7).Left #4 in to finish call flow – indicate normal SHAKEN processing |
|  | Pg 10/9. | “TN Letter of Authorization (LOA)” Should be “TNLoA” | editorial | NS | A |  |
|  | Pg 10/9. | In last paragraph replace “OriginatingService Provider local policy” with “OSP, TNSP, and enterprise policy” | Clarification not just OSP policy | NS | AM |  |
|  | Pg 10/9. | At end of section add: “Note for a given call the same mechanism needs to be supported by the OSP, TNSP, and enterprise.” | Clarify need 3 entities to support the same mechanism for it to work. | NS | A |  |
|  | Pg11/ A. | In 2nd paragraph replace “This section is envisioned to identify approaches” with “This clause identifies approaches” | editorial | NS | A |  |
|  | Pg11/A.1 | In 1st paragraph replace “Three sub-options have been presented” with “Three sub-options are presented” | editorial | NS | A |  |
|  | Pg11/A.1 | In 2nd paragraph replace “an additional SIP Identity field” with “a SIP Identity field to be” | “additional” implies there will be 1 or more additional Identity headers sent from the enterprise | NS | A |  |
|  | Pg11/A.1 | Delete following text from lines 335-337“- The additional information included with the enterprise Identity header field is optionally used by the terminating service provider analytics and call validation treatment functions when presenting the inbound call to the subscriber.” | Implies the Identity header sent by enterprise could be passed to TSP versus always consumed by OSP | NS | A |  |
|  | Pg11/A.1 | Line 343 Replace “The details of these proposals” with “These proposals are still being developed and draft details” | Clarify the referenced documents are not final | NS | A |  |
|  | Pg12/A.2 | Delete text on lines 353-364, beginning with “When an …” and ending with “the authorization.” | Text not specific to this approach and covered in main text of the report. | NS | A |  |
|  | Pg12/A.2 | Expand Acronyms “PKI” & “AS/VS” | editorial | NS | A |  |
|  | Pg12/A.2 | Line 377 Replace “The details of this proposal” with “This proposals is still being developed and draft details” | Clarify the referenced document is not final | NS | A |  |
|  | Pg12/A.3 | Line 399 Replace “The details of this proposal” with “This proposals is still being developed and draft details” | Clarify the referenced document is not final | NS | A |  |
|  | Pg12/A.3 | Expand Acronyms “RESTful” & “ API” | editorial | NS | A |  |
|  | 13/A.4 | Line 429 replace “SP” with “OSP” | Clarification of SP role | NS | M | Sentence deleted in Comcast comments |
|  | 13/A.4 | Line 432 replace “SP” with “TNSP” | Clarification of SP role | NS | M | Sentence deleted in Comcast comments |
|  | Pg15-17/A.4 | Table header replace “TN LOAs” with “TNLoAs” | editorial | NS | A |  |
|  | Pg15/A.4 | The header row should appear on all pages of the multiple page table A-1 | editorial | NS | A |  |
|  | Pg15/A.4 | In table A-1, Delete footnote 2 | Agreement is OSP always adds Identity header | NS | A |  |
|  | Pg15/A.4 | In table A-1, Delete row “TSP verifies SHAKEN Identity header” | Not needed – the next row covers the important point that no impact to STI-VS | NS | A |  |
|  | Pg16/A.4 | In table A-1, Footnote 4, replace “each enterprise and its selected OSPs” with “each enterprise and its selected OSPs and TNSPs” | Clarify that TNSP must also be involved in option(s) selection | NS | A |  |
|  | Pg16/A.4 | In table A-1, Footnote 6, replace “O-SP” with “OSP” | editorial | NS | A |  |
|  | Pg17/A.4 | In Table A-1 delete the last row “Ported numbers take effect Immediately” | Context not clear. If it is covering a new TN then there may be impact – e.g. the new TN would not be part of an existing TNAuthList. | NS | A |  |
|  | Pg 17/Footnote 10 | replace “TN LOAs” with “TNLoAs” | editorial | NS | A |  |

**Other Information (e.g., Tables, Figures):**

## Letter Ballot: [PTSC-LB-248]

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| **Company Name: [Neustar, Inc.]** |
| **TO BE COMPLETED BY COMMENTER** | **TO BE COMPLETED BY SUB/COMMITTEE** |
| **Auto#** | **Page/Section/Line #** | **Comment** | **Rationale/Suggested Solution** | **Type[[5]](#footnote-5)** | **Res.**[[6]](#footnote-6) | **Discussion/Explanation/Note *(if comment is modified, accepted/modified via a separate ballot comment, or not accepted)*** |
|  | Abstract | Abstract doesn’t reflect scope of Technical Report. Re-use text from Executive Summary. | Use Lines 2-8 for Abstract or basis for an Abstract. | NS | A |  |
|  | Line 5 | General: Are we using “delegate” or “delegated” certificates? | Applicable ATIS baseline uses “delegate” | NS | A |  |
|  | Line 15 | Do we want to talk about this as a “problem” throughout? | How about, in this specific case, “how these different mechanisms approach solving the added complexities in these use cases.” | NS | A | To be accepted throughout |
|  | Line 70 | Add hyphen to ATIS 1000074 | Change to “ATIS-1000074”; Editorial | NS | A |  |
|  | Line 78 | “techniques” used as a plural? | Delete “any”; Editorial | NS | A |  |
|  | Line 104 | Add comma; add throughout as needed for consistency | “e.g.,”; Editorial | NS | A |  |
|  | Line 127 | Replace “AKA” | Use “i.e., TN Assignee”; Editorial | NS | A |  |
|  | Line 136 | Replace “of its” | Use “for its”; Editorial | NS | A |  |
|  | Line 160 | Replace “PA” | “associated STI-PA” | NS | A |  |
|  | Line 164 | Add possessive like earlier reference | “OSPs’”; Editorial | NS | A |  |
|  | Line 167 | Agree with Charter to delete or minimally re-purpose as intro to following section. |  | NS | A | Moved text to beginning of Section 8 (Now 7) |
|  | Line 247 | Remove extraneous text? | Don’t believe “SIP Invite with Verstat ‘authenticated’ should/needs to be just in this Use Case figure | NS | A | Can’t show change mark inside diagram – had to replace with only change deleting proposed text |
|  | Line 256 | Change “;” to “:” | Editorial | NS | A |  |
|  | Line 271  | Add “representative” | “representative use cases” since not exhaustive | NS | A |  |
|  | Line 296 | Add possessive like earlier reference | “OSPs’”; Editorial | NS | A |  |
|  | Line 321 | Second part of this sentence doesn’t make sense? | Clarify or just delete this part since seems a bit out of context | NS | AM | Insert “,” after certificate and inserted “and” after “,” and between extended |
| 17 | Lines 323-339 | This summary should have an intro sentence and each item better bulleted or should Line 319 say “below” and not “above” | Editorial and format | NS | A | Added intro sentence |
| 18 | Line 325 | What does “or a field” mean? | This should have some more context; unclear as introduced | NS | A | Deleted “or a field” |
| 19 | Lines 344-346 | Put these in same order as introduction and use same names throughout document for consistency |  | NS | A |  |
| 20 | Line 346 | Update to “R005”? |  | NS | A |  |
| 21 | Line 345 | Incomplete baseline document number? | Update | NS | I | Latest version indicated |
| 22 | Lines 360-364 | Sentence too long and doesn’t make sense as written? | Can support Charter’s proposal to remove Lines 353-364 | NS | A | Deleted as per Charter comments |
| 23 | Line 369 | Replace second “that” with “and” | Editorial | NS | A |  |
| 24 | Line 377 | Remove underline for consistency | Editorial | NS | A |  |
| 25 | Line 379 | Is it “Central Database” or “Central TN Database” | Ensure consistency throughout; Editorial | NS | A | Central TN Database – made consistent |
| 26 | Lines 393-397 | These sections are a description of each method and no other one covers benefits | Remove these Lines for consistency | NS | AM |  |
| 27 | Line 401 | Fix Section header (font size) for consistency | Format | NS | A |  |
| 28 | Lines 406-452 | This is a difficult and confusing description on Delegated Certificates | Reduce to size of other related sections below or a reader can easily discount these approaches with all the unnecessary complexity added | NS | AM | Deleted some sentences and edited others per LB comments |
| 29 | Line 407 | Remove comma after “Delegated Certificates” | Editorial | NS | AM | Edited sentence per other LB comment |
| 30 | Line 409 | What does “one of the trusted STI-CAs” mean? | This is used several times and unclear what entities these are | NS | AM | Changed to “approved” CA |
| 31 | Line 415 | “use” to “can use” |  | NS | A |  |
| 32 | Line 417 | Remove extra period at end of sentence | Editorial | NS | A |  |
| 33 | Lines 420-424 | I don’t recall us ever discussing and agreeing that all three of these sub-options require the national STI-PA. | Should review as a group and update accordingly | NS | I | Paragraph refers to two (2) options not three; Enterprise and Lemon Twist |
| 34 | Line 438 | If Lemon-Twist uses an enterprise identifier, how can it communicate what TNs the enterprise can legitimately use? Nowhere does it say that the TN Authorization List has both an SPC and TNs/TN Ranges. Also, not sure how the Service Provider Code token terminology applies to an enterprise who is not a service provider? |  | NS | AM | Inserted disclaimer into Executive Summary, to be edited offline: “These are proposed solutions and key aspects are not currently implemented in the industry.”  |
| 35 | Line 478 | Change “three approaches” to “the three general approaches” | Editorial | NS | A |  |
| 36 | Line 486 | Footnote 3: TN Authorization List shows up at least three different ways | Agree on one way and update for consistency throughout | NS | A | TNAuthList – consistent in document |
| 37 | Line 486 | Footnote 5: change “use-cases” to “use case” | Editorial | NS | A |  |

**Other Information (e.g., Tables, Figures):**

1. Type of change: Insert **S** or **NS**: Substantive (**S**) (*see* [*ATIS OP*](http://www.atis.org/01_legal/operatingpro.asp) *Section A.6*) or Non-Substantive (**NS**) [↑](#footnote-ref-1)
2. Resolution (how was comment considered): Insert **A**, **AM**, **N**, **I**, or **W**: Accepted (**A**), Accepted as Modified (**AM**), Not Accepted (**N**), For Information/No Action/Noted (**I**), or Withdrawn (**W**). [↑](#footnote-ref-2)
3. Type of change: Insert **S** or **NS**: Substantive (**S**) (*see* [*ATIS OP*](http://www.atis.org/01_legal/operatingpro.asp) *Section A.6*) or Non-Substantive (**NS**) [↑](#footnote-ref-3)
4. Resolution (how was comment considered): Insert **A**, **AM**, **N**, **I**, or **W**: Accepted (**A**), Accepted as Modified (**AM**), Not Accepted (**N**), For Information/No Action/Noted (**I**), or Withdrawn (**W**). [↑](#footnote-ref-4)
5. Type of change: Insert **S** or **NS**: Substantive (**S**) (*see* [*ATIS OP*](http://www.atis.org/01_legal/operatingpro.asp) *Section A.6*) or Non-Substantive (**NS**) [↑](#footnote-ref-5)
6. Resolution (how was comment considered): Insert **A**, **AM**, **N**, **I**, or **W**: Accepted (**A**), Accepted as Modified (**AM**), Not Accepted (**N**), For Information/No Action/Noted (**I**), or Withdrawn (**W**). [↑](#footnote-ref-6)