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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-255]

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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[[1]](#footnote-1)** | **Res.**[[2]](#footnote-2) | **Discussion/Explanation/Note *(if comment is modified, accepted/modified via a separate ballot comment, or not accepted)*** |
|  | Title | Replace Title with“Toll-Free Numbers in the SHAKEN Framework” | Document doesn’t cover only Toll Free calls. Also covers calls where the calling party number is a TFN. |  |  |  |
|  | Abstract | Replace abstract with the followingThis document is intended to cover calls using Toll-Free numbers (TFNs) within the SHAKEN Framework. This addresses both calls where the calling party number displayed in the Caller ID is a TFN and where the called party number is a TFN. This document considers those scenarios in order to attain full attestation for the TFN. | Clarify scope of document |  |  |  |
|  | L4 | Replace with:“Toll-Free Calls”With“calls where the calling and/or called party number is a TFN”. | Clarify scope of document |  |  |  |
|  | L8 | Replace “calling telephone” with“calling party telephone” | Align with ATIS-1000074 |  |  |  |
|  | L10 | Expand “STI-AS” & “PASSporT” | 1st use of acronyms |  |  |  |
|  | L13 | Replace text with“This document identifies scenarios where the calling and/or called party number is a TFN and the process for call authentication.” | Clarify scope |  |  |  |
|  | L 21 | Add new Reference[Ref 12] ATIS-1000092 “Signature-based Handling of Asserted information using toKENs (SHAKEN): Delegate Certificates” | Document mentions delegate certs and needs this reference. |  |  |  |
|  | L27-30L33, L35-36,L40-41L 43-L48 | Delete References 5, 6, 8, 10, 101, and 105 through 109 | Not referenced in document (or propose deleting where it is referenced) |  |  |  |
|  | L56-58,L66-79,L90,L94-99,L105-106,L111-114,L120-124,L133-135, andL151-159 | Delete following terms:Call DiversionCertificate ChainCertificate PathCertificate Revocation ListCertificate Signing RequestChain of TrustCertificate ValidationFingerprintNational/Regional Regulatory AuthorityOnline Certificate Status ProtocolProof of Possession of a TN:RedirectRetargetTelephone Identity:Trust AnchorTrust Anchor CATrusted CA:Trust Model | Terms not used (except in some cases in definition of terms that aren’t used) |  |  |  |
|  | L 91-93 | Delete definition for Identity | Term Identity is used in multiple places in document but not consistent with the given definition |  |  |  |
|  | L 117 | At end add:“RespOrgs are the only parties who assign, manage and administer Toll-Free numbers in the SMS/800 Toll-Free Number Registry.” | Text moved here from definition for TN Assignee and TNSP |  |  |  |
|  | L140-141 | Delete:“This definition also applies to Toll-Free Number Assignees (TFN Assignee)” | Term TFN Assignee not used |  |  |  |
|  | L 141-L142,L146-148 | Delete “RespOrgs (see Responsible Organization above) are the only parties who assign, manage and administer Toll-Free numbers in the SMS/800 Toll-Free Number Registry.” | Text moved to definition for RespOrg |  |  |  |
|  | L143-148 | Replace text with:**Telephone Number Service Provider (TNSP):**An entity that is authoritative over a set of telephone numbers, and that can delegate a subset of those telephone numbers to another entity to attest for signing. In the context of this document a TNSP is a SHAKEN entity that is authorized by the STI-PA to obtain STI certificates from an STI-CA.Ultimately the entities entitled to obtain STI Certificates will be defined by the STI-GA. | Align with Definition in the Delegate Cert Document ATIS-1000092 |  |  |  |
|  | L53 | Add the following Definitions in 3.1“Subordinate CA (SCA):A CA whose public-key certificate is issued by another(superior) CASecure Telephone Identity Subordinate CA (STI-SCA): An SCA that gets its certificate directly from an STI-CA.” | Definitions align with ATIS-1000092 |  |  |  |
|  | 3.2 | Delete Acronyms:3GPPB2BUACRLIMSJSONJWSOCSPSPIDTLS | Unused acronyms (or proposed deleting text where used) |  |  |  |
|  |  | AddBGCF | Missing Acronym |  |  |  |
|  | L166-167 | Replace:Where the originating entity utilizes the network connectivity of the OSP who also is the RespOrg, and where the OSP has assigned the Toll-Free Number used as the Caller ID, With:“Where the originating entity utilizes the network connectivity of the OSP who is also the Resp Org or the reseller who assigned the TFN used as the Caller ID,” | Cover OSP as Reseller that assigned the TFN |  |  |  |
|  | L 183 | Delete the following:“for industry traceback purposes” | Purpose is not traceback & change Aligns with corresponding text in ATIS-1000089. |  |  |  |
|  | L188-190 | Delete items 8 & 9 | Items deal with TSP where issue being addressed is OSP being able to assert A level Attestation. Also item 9 would imply the TSP may require (since says should not versus must not) the TN/TFN to be assigned by the OSP. |  |  |  |
|  | L196-207 | Replace section 5.1 withSTIR/SHAKEN describes a framework for originating service providers to create a SHAKEN PASSporT that can be carried by the SIP signaling protocol to cryptographically attest the identity of callers. (ATIS-1000074 [REF3] and ATIS –1000085 [REF102]). Businesses rely on calls using TFNs as the calling party number and it is important to have their calls processed appropriately through the SHAKEN framework. | Authentication for a call to Toll Free Numbers is already covered in existing specifications (ATIS-1000085 & ATIS-1000074). Issue is calls with TFN as calling party number. |  |  |  |
|  | L228-238 | Delete the text or move to an Appendix or to definition of RespOrg | Information not relevant to this document and it is not the place to specify process of become a RespOrg. The existing Reference to ATIS- 0417001-003 is sufficient. |  |  |  |
|  | L257 | Change title of 5.3.2 to“Using TFN as Calling Party Number” | Align title with content of section |  |  |  |
|  | L259 | Change title of Figure 5.2 to“Enterprise using TFN as the calling party number” | Editorial clarification. |  |  |  |
|  | L269 | Replace“Responsible Organizations (RespOrgs) are the TN Providers (TNSP)”With“RespOrgs are TNSPs” | Acronyms already defined |  |  |  |
|  | L274 | Replace“Toll-Free calling number” with“TFN as the calling party number” |  |  |  |  |
|  | L276-279 | Replace text with:By using Delegate Certificates as specified in [Ref 12]. Refer to Clause 6.2” |  |  |  |  |
|  | L288 | Replace “7.1” with “6.1” |  |  |  |  |
|  | L290 | Replace Text with:“[Ref 12] authorized SP that is or is not a RespOrg may issue Delegate” | Add reference to delegate Cert spec and reworded since it does not preclude RespOrgs assigning Delegate Certificates.  |  |  |  |
|  | L294 Figure 6.1 | Replace “Subordinate CA” with“STI-SCA” | Align with ATIS-1000092 |  |  |  |
|  | L297 | Replace “7.1” with “6.1” |  |  |  |  |
|  | L297 | Replace “assigns” with“issues a delegate end-entity certificate for” | Figure covers issuing of delegate cert not assignment of TFN which was covered in Figure 5.1 |  |  |  |
|  | L300-302 | Replace “Subordinate CA” with“STI-SCA” |  |  |  |  |
|  | L305L311L312 | Replace “7.2” with “6.2” and |  |  |  |  |
|  | L305 | Replace “originated Toll-Free Number” with“originating TFN” |  |  |  |  |
|  | L308Figure 6.2 | Modify figure as follows1. In Step 1 & 2 – use base PASSporT not rcd
2. Add STI-VS in OSP & new step (between 2 & 3) where OSP gets certificate from TNSP-a
3. Step 3 delete rcd Identity header
4. Delete Step 5
 | OSP must validate delegate cert in order to give A level |  |  |  |
|  | L315-316 | Replace the following text“The VoIP Entity Call Control function invokes the RCD-AS to perform rcd authentication for calling TFN-a, as specified in the draft RCD specification [Ref 6]. The RCD-AS constructs a "rcd" PASSporT containing an "orig" claim of TFN-a and a "dest" claim of TN-x, plus "rcd" claim information for the VoIP Entity, and signs the PASSporT using the private key associated with the delegate certificate”with“The VoIP Entity Call Control function invokes the STI-AS to perform authentication for calling TFN-a, as specified [Ref Delegate Cert]. The STI-AS constructs a base PASSporT containing an "orig" claim of TFN-a and a "dest" claim of TN-x, and signs the PASSporT using the private key associated with the delegate certificate” | Use base PASSporTs instead of “rcd” PASSporTs. |  |  |  |
|  | L319, L321, L323 | Replace ““rcd”” with “base” (base with no quotes) | Use base PASSporTs instead of “rcd” PASSporTs. |  |  |  |
|  | L323 | Replace “two” with “an” | base PASSporTs not sent end-to-end |  |  |  |
|  | L324 | Delete “one” |  |  |  |  |
|  | L324-L326 | Delete the following text:“, and one containing the received "rcd" PASSporT, as specified in the draft RCD specification [ATIS IPNNI-2020-00025Ref 6].” | base PASSporTs not sent end-to-end |  |  |  |
|  | L328-L329 | Delete the following text:“and invokes the RCD-VS to verify the received RCD Identity header as specified in the draft RCD specification [Ref 6]” | Use base PASSporTs instead of “rcd” PASSporTs. |  |  |  |
|  | L330-331 | Delete text | Use base PASSporTs instead of “rcd” PASSporTs. |  |  |  |
|  | L335 | Delete “containing the "rcd" PASSporT” | Use base PASSporTs instead of “rcd” PASSporTs. |  |  |  |
|  | L345 | Expand Acronym TFAS | 1st use |  |  |  |
|  | L348 | Before the closing parentheses in the Footnote in Figure 6.4 add “[REF 102]” |  |  |  |  |
|  | L361 | Before the closing parentheses in the Footnote in Figure 6.6 add “[REF 102]” And after the parentheses add“. Although not shown, adding the “div” PASSporT would require a second invocation of the STI-AS.” | Clarify what happens when add div PASSporT |  |  |  |
|  | L369, L372, L373 | In Figure 6.7 and items 1 & 2 after the list replace the 5 occurrences of “-123-“ with “-321-“ | To comply with the NPA-Nxx format of TNs |  |  |  |
|  | L369,  | In Step 4 of Figure 6.7 replace“Verstat ‘No-TN-Validation’” withWith“no Verstat parameter sent” | No specification specifies sending Verstat ‘No-TN-Validation’ for B level Attestation. Baseline for ATIS-1000074 update specifies not sending verstat value of TN-Validation-Passed when Attestation is not A |  |  |  |
|  | L378 | Replace “populates a verstat value “No-TN-Validation””With“sends no Verstat parameter” | No specification specifies sending Verstat ‘No-TN-Validation’ for B level Attestation. Baseline for ATIS-1000074 update specifies not sending verstat value of TN-Validation-Passed when Attestation is not A |  |  |  |
|  | L381 | Delete Line | Probably intended to be the note that is already in Figure 6.6. |  |  |  |
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**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)