

 May 16, 2022

ATIS/SIP Forum NNI Task Force

733 Turnpike Street, Suite 192

North Andover, MA 01845

Dear Members of the ATIS/SIP Forum NNI Task Force,

The American Bankers Association, ACA International, American Financial Services Association, Credit Union National Association, Mortgage Bankers Association, National Association of Federally-Insured Credit Unions, National Council of Higher Education Resources, and Student Loan Servicing Alliance (collectively, the Associations)[[1]](#footnote-1) appreciate the opportunity to provide feedback on the standard that the ATIS/SIP Forum NNI Task Force (Task Force) is developing for telephone companies that block calls and their analytics providers (collectively, Voice Service Providers or Providers) to use Session Initiation Protocol (SIP) Code 603 to notify the caller that its call has been blocked.

**Proposed Response:**

*The ATIS/SIP Forum NNI Task Force (Task Force) appreciates the input provided by the American Bankers Association, ACA International, American Financial Services Association, Credit Union National Association, Mortgage Bankers Association, National Association of Federally-Insured Credit Unions, National Council of Higher Education Resources, and Student Loan Servicing Alliance (collectively, the Associations)[[2]](#footnote-2) to the standard being developed for telephone companies that block calls and their analytics providers (collectively, Voice Service Providers or Providers) to use Session Initiation Protocol (SIP) Code 603 to notify the caller that its call has been blocked.*

As you know, SIP Code 603 was initially designed to signal that the recipient “decline[d]” the call.[[3]](#footnote-3) In the Federal Communications Commission’s (Commission) Order on Reconsideration issued on December 30, 2021,[[4]](#footnote-4) the Commission permitted Voice Service Providers to use SIP Code 603, in addition to SIP Codes 607 or 608, to satisfy the Commission’s requirement promulgated in 2020 that a Provider immediately notify callers when it has blocked the caller’s call.[[5]](#footnote-5) We have expressed concern to the Commission that, under the Order, a caller receiving a SIP Code 603 response would not be able to understand whether the response code signaled that the call’s recipient declined the call or that the Provider blocked the call in the network.[[6]](#footnote-6)

**Proposed Response:**

*The Task Force profiles the use of IETF RFCs for implementation within North American Providers’ networks analogous to the manner in which the 3GPP profiles the use of IETF RFCs in 3GPP based systems. Any modifications or creation of new RFCs is solely under the control of the IETF. The Task Force has determined that the most expeditious path to achieving a deployable solution that can meet the Associations’ needs is to develop a profile of the SIP Code 603 that respects RFC 3261 as written and currently deployed within Providers networks.*

We understand that the Task Force is developing an enhanced version of SIP Code 603 (SIP Code 603+) that would allow the caller to distinguish between a 603+ Code that indicates the called party declined the call from the receipt of a 603+ Code that signals that the Voice Service Provider blocked the call. In response to your suggestion that the Associations identify issues important to the calling community when receiving blocking notification, we provide the following:

**Proposed Response:**

*The current draft of the profile of SIP Code 603 (SIP Code 603+), Robocall Call Blocking Notification[[7]](#footnote-7), reflects many of the issues identified by the Associations. In response to the specific issues raised, we offer the following:*

1. SIP Code 603+ must utilize a uniform, standard word or phrase in the header of the code that clearly indicates that the call has been blocked in the network based on the use of analytics. The current iteration of the Task Force’s base document for the standard for SIP Code 603+ suggests using the reason phrase “Network Blocked” for this purpose.[[8]](#footnote-8) It should be made clear, including through a revision of documentation for SIP Code 603 maintained by the Internet Engineering Task Force (IETF) (the body that sets generic standards for internet protocols) that Providers blocking calls in the network based on analytics shall use only a standardized uniform reason phrase.

**Proposed Response:**

*The Task Force’s intent is to create a profile of the 603 SIP Response Code that standardizes a “reason phrase” for inclusion in the first line of the SIP response to a call request that was blocked by network analytics, and provides contact information for the party responsible for the blocking in the SIP Reason header. The proposed “603+” profile is defined based on this standardized information. This new standardized profile does not prohibit international recognition of the standardized population of the 603 reason header. The IETF allows the standardization of words or phrases within the 603 reason header, as is being proposed in the Task Force.*

2. The standard for a 603+ Code must enable the code to be read using automated, machine-readable technology.

**Proposed Response:**

*The Task Force expects that the information provided by the proposed solution will be machine readable. Specifically it will be in text format, as are all SIP messages, and its structure will be well defined in the Task Force specification to facilitate software design.*

3. It should be clear that a 603+ Code without a reason header signifies the called party has declined the call, per existing IETF documentation.[[9]](#footnote-9) A 603+ Code with the uniform standard reason phrase shall signify network blocking by analytics. A 603+ Code should not be used for any other purpose.

**Proposed Response:**

*603+ is differentiated from a 603 response in that it contains a format where it has:*

*603 NETWORKED BLOCKED with Reason code that has reason = analytics, and the contact info of whom blocked.*

*Any 603 received without this syntax included should be treated as current handled today.*

4. The reason header must include, in standardized formats, the name and contact information for the blocking entity.

**Proposed Response:**

*The intent of the Task Force is to standardize the format in which the identity and contact information of the entity responsible for the analytics-based call blocking is presented.*

5. The standard for SIP Code 603+ should address, to the extent practicable, the transmission of the 603+ Code across international boundaries. Specifically, SIP Code 603+ must be able to provide effective notification in the following instances: (1) where the caller is located in the United States, and the call recipient is located outside the U.S.; (2) where a U.S. company caller placed the call from a location outside of the U.S. to a recipient outside the U.S.; (3) where a U.S. company caller placed the call from a location outside of the U.S. to a recipient inside the U.S.; (4) where a U.S. company caller placed the call from a location within the U.S. to a recipient within the U.S., but the call was blocked by an intermediary provider that is located outside of the U.S.; and (5) where the subsidiary of an international Voice Service Provider that is providing services in the U.S. blocks a call.

**Proposed Response:**

*ANSI and ATIS standards are primarily developed for and adopted by US service providers.  Other countries may adopt these standards and they may be implemented through bilateral agreement with business partners in the US pursuant to their business agreement. ANSI and ATIS Standards are not precluded from being used internationally.*

6. The standard for SIP Code 603+ should address which entity should receive notification where a third party initiates the call on behalf of a customer, for example, where a contact center is utilized.

**Proposed Response:**

*The Task Force standard specifies that a 603+ MUST be sent back toward the UA (user agent) over the UNI (user to network interface).*

7. To the extent practicable, the standard for SIP Code 603+ should consider cost of deployment and implementation by small carriers and both large and small enterprise callers.

**Proposed Response:**

*The Task Force has determined that profiling the SIP 603 Response Code provides the most expeditious path to an implementable solution that can facilitate an interoperable exchange of information identifying calls blocked by network based analytics and does not discriminate against small carriers or both large and small enterprise callers.*

8. The standard for SIP Code 603+ should ensure that callers’ calling applications are able to interrogate the header on the 603+ Code. Currently, the response codes that callers receive (SIP “call traces”) are cumbersome for callers to examine, and callers’ calling applications will need to be re-programmed so that they interrogate the header of the response codes.

**Proposed Response:**

*The Task Force standard being proposed for SIP 603+ follows a precise syntax that allows SIP messages to be efficiently processed via automated processing, allowing consistent interrogation of the header on the response code. There are many commercially available products that can process SIP messages.*

Thank you for consideration of these views. We look forward to continued discussion of the standards for SIP Code 603+.

**Proposed Response:**

*Again, we appreciate the opportunity to consider input and the views of the Associations. We look forward to continued discussion of the standards for SIP Code 603+.*

Sincerely,

American Bankers Association

ACA International

American Financial Services Association

Credit Union National Association

Mortgage Bankers Association

National Association of Federally-Insured Credit Unions

National Council of Higher Education Resources

Student Loan Servicing Alliance

1. A description of each Association is provided in the Appendix. [↑](#footnote-ref-1)
2. A description of each Association is provided in the Appendix. [↑](#footnote-ref-2)
3. Internet Engineering Task Force, *SIP: Session Initiation Protocol* 191 (2002), <https://datatracker.ietf.org/doc/html/rfc3261#page-192> [hereinafter, IETF Session Initiation Protocols]. [↑](#footnote-ref-3)
4. *Advanced Methods To Target and Eliminate Unlawful Robocalls*, Order on Reconsideration, CG Docket No. 17-59, 86 Fed. Reg. 74,373 (2021). [↑](#footnote-ref-4)
5. *Advanced Methods To Target and Eliminate Unlawful Robocalls*, Fourth Report and Order, CG Docket No. 17-59, 86 Fed. Reg. 17,726, 17,729-30 (2021). [↑](#footnote-ref-5)
6. *See, e.g., Advanced Methods To Target and Eliminate Unlawful Robocalls*, Partial Opp. & Comments of the Am. Bankers Ass’n *et al.* to the Pet. for Recons. & Request for Clarification of USTelecom, CG Docket No. 17-59 (Jun. 4, 2021), <https://www.aba.com/advocacy/policy-analysis/joint-trades-comment-on-ustelecom-petition-on-call-blocking>. [↑](#footnote-ref-6)
7. [IPNNI-2022-00027R006.docx](https://access.atis.org/apps/org/workgroup/ipnni/download.php/66137/IPNNI-2022-00027R006.docx) (https://access.atis.org/apps/group\_public/document.php?document\_id=66137&wg\_abbrev=ipnni) [↑](#footnote-ref-7)
8. Alliance for Telecommunications Industry Solutions, *Draft ATIS Standard on Robocall Call Blocking Notification*, 2, § 4.1 (last visited May 16, 2022), https://access.atis.org/apps/group\_public/download.php/64561/IPNNI-2022-00033R002.docx. [↑](#footnote-ref-8)
9. *See* IETF Session Initiation Protocols, *supra* note 2, at 191. [↑](#footnote-ref-9)