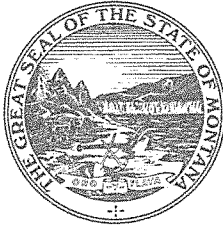


# Montana Public Service Commission

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Travis Kavulla - Vice Chairman  
District 1

May 3, 2018

Kris Monteith  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Submission of Final Report, *Call Authentication Trust Anchor: Selection of Governance Authority and Timely Deployment of SHAKEN/STIR*, by the of the North American Numbering Council

Dear Ms. Monteith:

On behalf of the North American Numbering Council (NANC), I am pleased to provide the above-entitled report you directed in your letters of December 7, 2017, and February 18, 2018, related to the Call Authentication Trust Anchor (CATA) ecosystem.

In my opinion, the report details a framework for call authentication that can more quickly be established than various alternatives, while obtaining the broadest participation of industry.

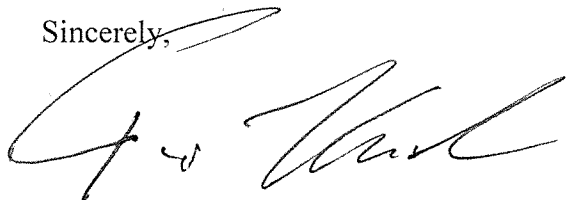
The report describes the role and characteristics of a governance authority (GA) and the process by which it should be established and its board chosen. Similarly, the report details how the GA should act to choose a policy administrator (PA), and provides definition around a PA's duties. The report also proposes to establish a technical advisory council to the GA, and describes the proposed role of the Commission in overseeing the GA.

Importantly, in addition to offering a framework for governance through industry cooperation, the report provides a set of milestones for adoption and deployment of a SHAKEN/STIR call authentication system, including metrics by which the industry's progress can be measured. It also identifies certain actions the Commission may wish to take to ensure that these milestones and timelines are met.

Finally, within the Appendix, the report also presents additional areas of inquiry which should be investigated in implementing an effective mechanism to combat spoofing and illegal robocalling.

I would like to thank the CATA working group for their thoughtful and diligent work, which has resulted in a consensus product that sets a clear bar for the communications industry to meet in the near future. Likewise, I thank the FCC for its work to protect consumers from the fraud, annoyance, and other ills that result from unwanted and illegal robocalls.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Kavulla". The signature is fluid and cursive, with a large initial "T" and "K".

Travis Kavulla

Chairman, North American Numbering Council