STIR/SHAKEN and the Requirements of the Contact Center Industry

SIP NOC 2018

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Chief Intellectual Property/Regulatory Counsel

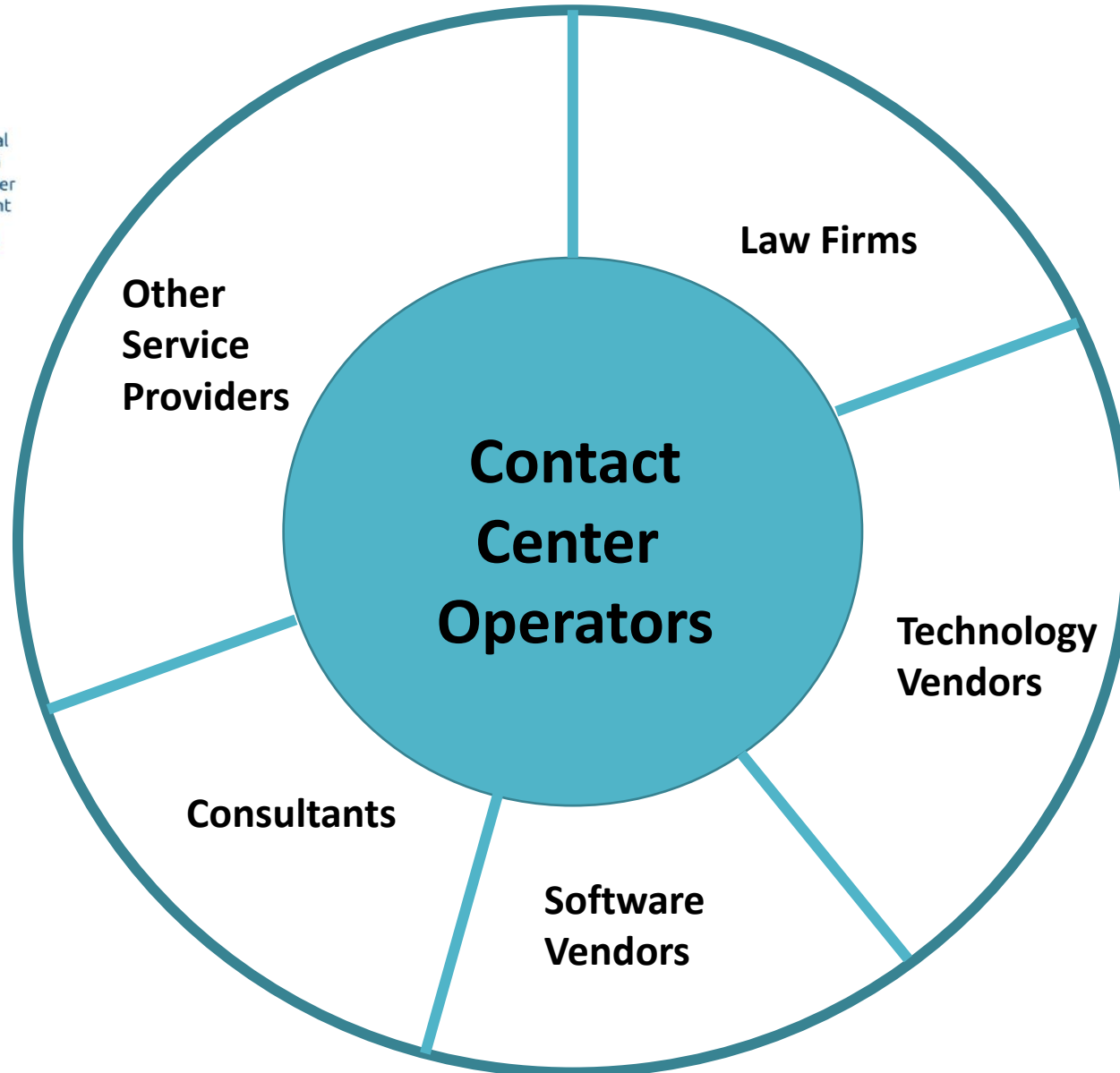National Board Member - PACE

NOBLE SYSTEMS

PACE® | Professional Association for Customer Engagement

Customer Focused. Contact Center Driven.

Contact Center Operators

- **Diverse Characteristics**
- **Highly Human Intensive**
- **High Call Volumes**
- **Many Short Duration Calls**
- **High Percentage of No Right Party Contacts**
- **Pre-recorded Messages May be Played**
- **Spoofed Numbers**

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Contact Center Architecture

(There is no standard)

Agents

SBC

Carrier Networks

Call Handler
(ACD, Dialer, Blended, CTI, PBX)

IVR

Other Channels

LAN

WFM

Storage

Speech Analytics

CRMS

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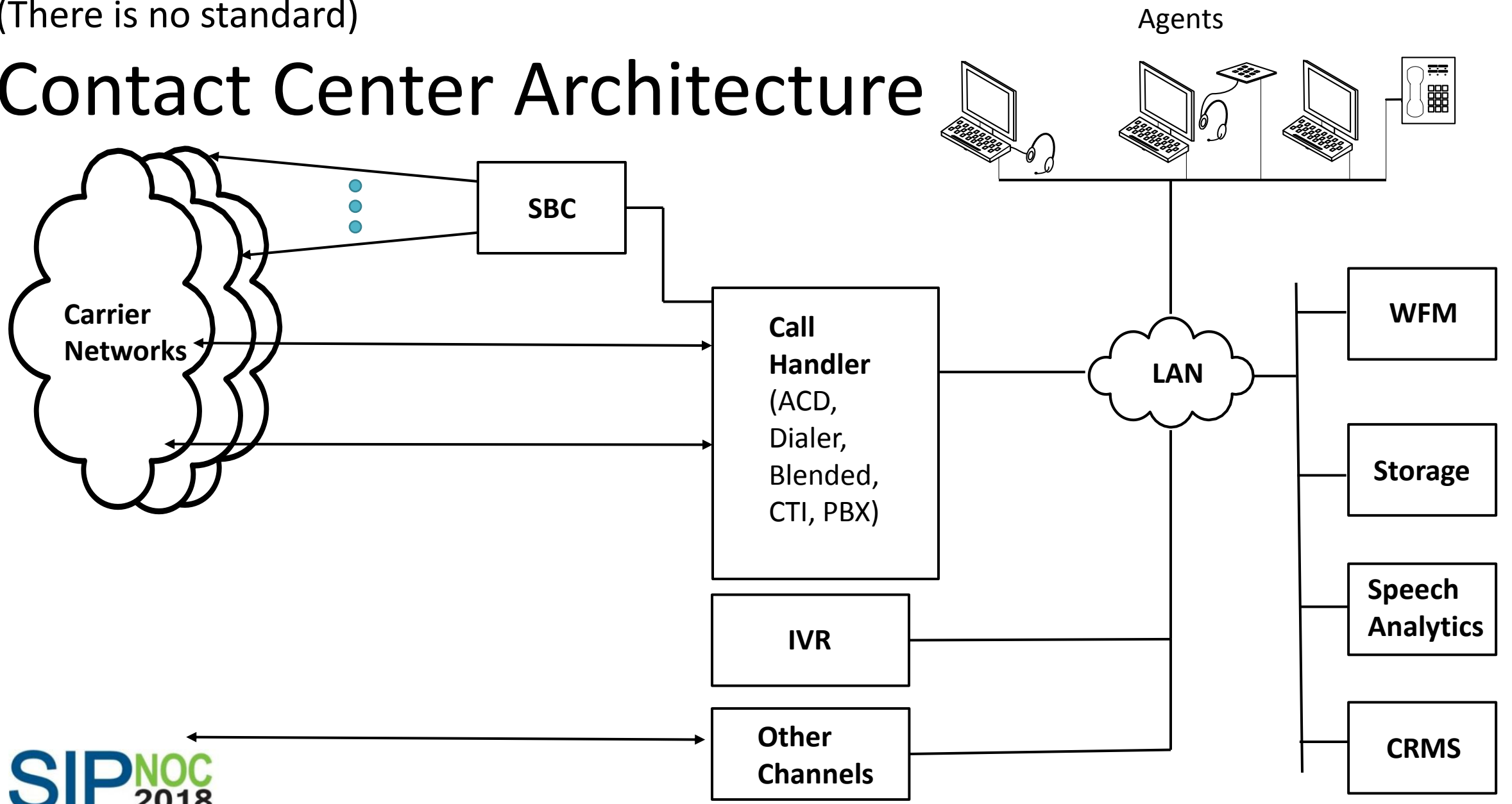
Pressures on Contact Center Operators

- **Agent Efficiencies**
  - -Hourly/loaded salary
  - -Turnover/training
- **Compliance with Regulations**
- **Litigation – TCPA, FDCPA, state laws, etc.**
- **Competitive landscape**
- **Robocall Processing**

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Robocall Processing

FCC's 2015 Order:

- **Authorizing Any Carrier to Blocking:**
    - Invalid, Unassigned, Unallocated, and Unauthorized Numbers

- **Also Authorized Terminating Carriers to Block Types of Calls**
    - Gave rise to carrier based analytics blocking
    - Supplemented growing mobile-based robocall applications
    - Supplemented call labeling

    Arguably, the FCC Authorized this type of blocking before fully understanding

    Its impacts.

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Call Blocking Concerns

- **Mistakes will be made in blocking/labeling calls**
  - **How to know when errors occur?**
  - **How to check for errors?**
  - **How to correct?**
- **"FAKE Busy"**
  - **Blocked Calls are provided busy treatment**
  - **Lack of transparency to call originator**
  - **Desire a specific Call Rejection Cause Code/Intercept treatment**

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SHAKEN/STIR Concerns

- **Remember - Not all spoofing is illegal!**
- **Spoofing is Frequently used by Contact Centers**
  - Example – service utilized by doctors/hospitals to call patients for appointment reminders

- **Contact Centers May Use a Lot of Calling Party Numbers**
  - Numbers may have to be allocated or changed quickly
  - Calls may originate on one of several carriers, selected in real-time
  - Concern of anti-competitive carrier behavior
  - Concern over "partial attestation" indication
  - Concern over how spoofed numbers will be classified

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SHAKEN/STIR Concerns (cont.)

- **Mistakes are expected to occur in the authentication process**
  - **How are these detected, reported, checked, and corrected?**
  - **Various error conditions are defined in SHAKEN/STIR framework, but do they extend beyond the carrier to the customer?**
  - **Checking and requesting corrective actions involve interactions between the Carrier and Contact Center... which appears to be outside the scope of SHAKEN/STIR framework.**

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SHAKEN/STIR Concerns (cont.)

- ## How will authorized spoofing be authenticated?
  - "Partial Authentication" is not a preferable attestation indication for Contact Centers

- ## Proof-of-Possession Framework
  - **Where does this stand?**
  - **Gap between standards and actual deployment**
  - **PACE can be a source for input as to the needs of Contact Center Operators**

Thank You

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