

We are a reseller and do not have our own voice infrastructure capable to support STIR/SHAKEN implementation. We use a wholesale provider, Momentum Telecom.

“where, consistent with ATIS standards, an originating service provider provides an attestation for calls from its own reseller or [VASP] customer, it is not engaging in third party authentication; it is instead using its certificate to provide an appropriate attestation to traffic from its own customers. Stated differently, the originating service provider in that example is performing its own STIR/SHAKEN implementation obligation and is not acting as a third party for its upstream customer. Thus, if a wholesale provider originates a call onto the public network on behalf of a reseller customer that lacks control over the network infrastructure necessary to implement STIR/SHAKEN, it is the wholesale provider that has the STIR/SHAKEN implementation obligation, not the reseller. In this scenario, the wholesale provider is obligated to use STIR/SHAKEN to authenticate the caller ID pursuant to its own obligation under the Commission’s rules, not as a third party for the reseller that is exempt from STIR/SHAKEN implementation requirements.”