

Nationwide SCS, Inc.
34 Main St Ext, Suite 304
Plymouth, MA 02360

Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: STIR/SHAKEN Implementation

To Whom It May Concern:

On February 7th, 2022, we received an email from Michael Ray, Attorney-Advisor for the Robocall Mitigation Database Team within the FCC informing us that we needed to revise our filing because we were not an authorized service provider registered with the Secure Telephone Identity Policy Administrator (Policy Administrator) to participate in STIR/SHAKEN. When we initially filed, we were under the incorrect opinion that if our provider was registered, since we are a reseller, then that would cover our company as well.

Upon receipt, we reached out to our VoIP provider and were advised that we were incorrect and that we needed to determine if we need to file and if so, implement our own STIR/SHAKEN caller ID authentication framework.

After receiving that information, we emailed Michael Ray on 2/23, explaining the situation and requesting an extension or guidance on what should be included as reasonable steps to avoid origination illegal robocall traffic. We did not receive a response, so we reached out for legal counsel and were advised that we have exemption under 47 CFR § 64.6304 until June 30, 2023 because we are a Small Provider. We only have 3 customers with a monthly average of \$1500.00 to \$1700.00 in invoicing. Our customers are all Government municipalities, Boston Public Schools, Washington Metro Transit Authority, and the Modesto Area Express.

We are a reseller of VoIP Innovations / Sangoma and they have fully implemented STIR/SHAKEN on their network.

Our goal is to contract with Neustar's Certified Caller program which is compliant with STIR/SHAKEN, validates Caller ID, enables digital signatures, and detects and warns of call spoofing. This works in conjunction with STIR/SHAKEN to identify the unauthorized and suspicious use of phone numbers and detect trends and anomalies in calling patterns.

The possibility of illegal robocall traffic is limited due to the size of our company, the nature of our three customers, and the implementation of the service provider. Nationwide SCS, Inc. certifies that it commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in

investigating and stopping any illegal robocallers that use its service to originate calls, and that none of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, and that all of the voice traffic that originates on its network is subject to a robocall mitigation program.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Hickey", with a stylized flourish at the end.

Julie Hickey
CFO
Nationwide SCS, Inc.