



September 28, 2021

FILED VIA GCKEY

Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Gatineau, QC
K1A 0N2

Dear Mr. Doucet,

Subject: STIR/SHAKEN implementation readiness report

The North America Connect it Networks Company Inc. (“Connect It”) is a telecommunications service provider (“TSP”) that offers services including voice over Internet protocol (“VoIP”) services. As a provider of voice services, Connect It is required to implement STIR/SHAKEN pursuant to Compliance and Enforcement and Telecom Decision CRTC 2019-403¹. However, Connect It’s implementation of STIR/SHAKEN has been complicated and delayed because Connect It is a reseller of voice services.

As the Commission determined on 5 August 2021 by way of Compliance and Enforcement and Telecom Decision CRTC 2021-267² (“CETD 2021-267”), the Canadian Secure Token Governance Authority (“CST-GA”) policy for access to secure telephone identity (“STI”) certificates has caused constraints for non-eligible TSPs in complying with the Commission’s requirement for all TSPs to implement STIR/SHAKEN. These constraints have prevented Connect It from completing the early stages of STIR/SHAKEN implementation. Consequently, Connect It is unable to complete the detailed implementation readiness report described in Appendix 1 to Compliance and Enforcement and Telecom Decision CRTC 2021-123³ and in the Commission Staff Letter⁴ dated 23 July 2021.

In CETD 2021-267, the Commission determined that the CST-GA is expected to:⁵ (1) develop, within 60 days (from 5 August 2021), eligibility requirements that prevent access to STI certificates only for those TSPs that cannot be trusted to maintain the integrity of the STIR/SHAKEN framework; and (2) collaborate with non-eligible TSPs in the development of new

¹ *Establishment of the Canadian Secure Token Governance Authority*, Compliance and Enforcement and Telecom Decision CRTC 2019-403, 9 December 2019.

² *Mitel Networks Corporation – Application requesting the Commission to instruct the Canadian Secure Token Governance Authority to allow all telecommunications service providers to receive a STIR/SHAKEN certificate*, Compliance and Enforcement and Telecom Decision CRTC 2021-267, 5 August 2021.

³ *STIR/SHAKEN implementation for Internet Protocol-based voice calls*, Compliance and Enforcement and Telecom Decision CRTC 2021-123, 6 April 2021.

⁴ Telecom - Commission Letter addressed to the Distribution List dated 23 July 2021, Re: Compliance and Enforcement and Telecom Decision CRTC 2021-123 - STIR/SHAKEN implementation for Internet Protocol-based voice calls.

⁵ CETD 2021-267, at paras 51-52.



eligibility criteria for access to STI certificates. The next steps of Connect It's STIR/SHAKEN implementation schedule will be determined by the establishment of these new eligibility criteria for access to STI certificates. Once those eligibility criteria are determined, Connect It will consult with its voice service suppliers to determine the best approach for STIR/SHAKEN implementation going forward.

We hope that this update is helpful to the Commission. We welcome any questions that the Commission may have regarding Connect It's implementation of STIR/SHAKEN as a reseller of voice services.

Yours truly,

A handwritten signature in black ink that reads "tony larosa". The signature is written in a cursive, lowercase style.

Tony Larosa
Vice President of Operations

Copy: Jean-Francois Harbour, CRTC