

17 September 2021

Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Sir or Madam,

Re: Iristel robocall mitigation plan

1. Iristel Inc. (Iristel) hereby submits its robocall mitigation plan pursuant to § 64.6305 *Robocall mitigation and certification*.
2. Iristel is a Canadian Competitive Local Exchange Carrier (CLEC) with exchanges located in all ten provinces and three territories in Canada. Iristel specializes in VoIP telephony and provides wholesale VoIP services such as SIP trunks, telephone numbers, and other related IP telephony services to resellers. A significant number of Iristel's wholesale customers are U.S.A. based telecommunications service providers that have business requirements for access to Canada's PSTN.

STIR/SHAKEN implementation progress

3. Iristel has taken significant steps towards the implementation of STIR/SHAKEN on its network, as mandated by the Canadian Radio-Television and Telecommunications Commission (CRTC) in *Compliance and Enforcement and Telecom Decision CRTC 2021-123, STIR/SHAKEN implementation for Internet Protocol-based voice calls* and anticipates that it will have completed this implementation by 30 November 2021 for Canadian IP-based voice traffic. Iristel is a member of the Canadian Secure Token Governance Authority (CST-GA). However, at this time, implementation of STIR/SHAKEN on Iristel's network is not complete.

Reasonable Steps to Avoid Originating Illegal Robocall Traffic

4. Until such time as STIR/SHAKEN implementation is complete, Iristel is taking the following steps to mitigate illegal robocall traffic:
 - a. Iristel retail end-users are unable to spoof their caller-ID. Iristel's soft switch is specifically configured to reject calls from its end-users if the caller-ID is spoofed.

- b. Some Iristel enterprise users may be permitted to spoof caller-ID upon request if the use case is valid. For example, a company may wish to display its main number on all outbound calls rather than individual DID numbers. However, in general, rules similar to those for retail customers apply and customers cannot spoof their caller ID information.
- c. Iristel wholesale customers (resellers) are telecommunications service providers and are required to register with the CRTC as carriers or resellers. In this case, the onus is on them to implement STIR/SHAKEN and/or mitigate robocalls and they should register with the FCC directly if they originate IP-based voice traffic that is encompassed in paragraph (c) of § 64.6305 *Robocall mitigation and certification*. Telecommunication service providers may obtain Canadian telephone numbers from Iristel and while they must route inbound calls through Iristel's network, they are not required to route outbound calls through Iristel's network. As such, Iristel does not have the ability to verify the validity of caller ID even if the caller is using an Iristel originating number because the call may not flow through the Iristel network.
- d. Iristel cooperates with law enforcement requests regarding spoofed or fraudulent calls. In the majority of cases, when law enforcement requests customer of record information from Iristel, it relates to a number that Iristel has assigned to a reseller. In the event that the number is assigned to a reseller (as opposed to a direct Iristel end user customer), Canadian law and Iristel's commercial terms and conditions allows Iristel to provide to law enforcement the identity of the telecommunication service provider to whom the number has been assigned without a production order. Iristel responds to these law enforcement requests promptly, usually within 48 hours, by directing law enforcement to the appropriate telecommunications service provider. This removes the ability of a reseller to hide behind a carrier because it does not have its own numbering resources that can be looked up.
- e. Iristel rejects all calls that originate, transit or terminate on its network if the caller ID contains a number that is not valid under NANP or E.164, in conformance with the requirements of Compliance and Enforcement and Telecom Regulatory Policy CRTC 2018-484 *Implementation of universal network-level blocking of calls with blatantly illegitimate caller identification*.



Commitment to Respond to Traceback Requests

5. Iristel hereby commits to responding fully and in a timely manner 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.

Sincerely,

[Submitted electronically]

Jean-François Dumoulin
VP, Regulatory and Government Affairs

cc: Samer Bishay, Iristel CEO

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