

"The filer is a reseller of voice services through the AT&T Partner Exchange program and does not own, operate, or control the underlying telecommunications network infrastructure over which calls are transmitted. As a reseller, the filer has no access to or control over the call signaling infrastructure required to implement STIR/SHAKEN call authentication.

Pursuant to 47 CFR § 64.6301(b), the STIR/SHAKEN implementation obligation applies to voice service providers that operate IP networks. The filer does not operate an IP network — it resells service provisioned and controlled entirely by AT&T, the underlying facilities-based carrier. AT&T, as the originating network operator, bears and fulfills the STIR/SHAKEN signing obligation for calls on its network pursuant to 47 CFR § 64.6301(a).

Because the filer lacks the technical capability and network-level access necessary to implement STIR/SHAKEN authentication, it qualifies under the FCC's framework for providers that cannot implement STIR/SHAKEN on their network. In lieu of STIR/SHAKEN implementation, the filer has adopted a Robocall Mitigation Program consistent with 47 CFR § 64.6305(a) as described herein."