



voicepeering

Mr. Claude Doucet
Secretary General
Canadian Radio-television and Telecommunications Commission
Les Terrasses de la Chaudière
1 Promenade du Portage
Gatineau, Québec J8X 4B1

RE: *Application Requesting that the Commission instruct the Canadian Secure Token Governance Authority to allow all LECs to participate in STIR/SHAKEN, Part 1 Application by Mitel Cloud Services Inc., CRTC File 8638-M75-202008953, 5 January 2021 (the “Application”)*

8 February 2021

Dear Mr. Doucet,

1. The Canadian Voice Peering Project (“**CVPP**”) is a Canadian not-for-profit organization. The CVPP’s objective is to enhance the resiliency and responsiveness of Canada’s Public Switched Telephone Network (“**PSTN**”). The CVPP’s key activity, through which it pursues that objective, is to create a voluntary Canadian voice peering exchange. A voice peering exchange represents the porting over, to the PSTN, of the successful, volunteer-driven Internet Exchange Point (“**IXP**”) model.
2. IXPs are sometimes referred to as “public peering points”, in contradistinction to private meet-me points operating by individual carriers. They have been instrumental in reducing reliance on the largest Tier 1 backbone providers and lowering market entry costs. They have done so by facilitating direct, settlement-free interconnection between consenting Internet backbones. In the same way, the CVPP hopes to develop a sustainable model for the direct exchange—between service providers that use NANP-confirming telephone numbers, and provide universal access to or from the PSTN (“local voice providers”¹)—of voice traffic originating and terminating within Canada.
3. Essential to this interconnection facility, which increases network-wide resilience, is the ability of any interested Internet network to participate and, thereby, reduce reliance on any one upstream carrier. To wit, any Internet “Autonomous System” can participate in an IXP.
4. We understand that, in the U.S., criteria were first established requiring that participants be a service provider with an Operating Company Number (“**OCN**”), direct access to telephone numbers, and the appropriate annual FCC filings—but were recently broadened to a simple registration and participation requirement that removed the requirement for direct number access, in explicit response to “concerns raised by somestakeholders that the current SPC Token Access Policy

¹ This definition is set out in *Regulatory framework for voice communication services using Internet Protocol*, Telecom Decision CRTC 2005-28, 12 May 2005, paragraph 16, in reference to “local VoIP services” subject to certain regulation.

prevents certain categories of voice service providers from participating in STIR/SHAKEN.”² This broad access is adjunct to a system within which

- the not-for-profit Alliance for Telecommunications Industry Solutions Inc. (“ATIS”) acts as the Secure Telephone Identity Certification Authority (“STI-CA”);
 - the STI-CA contracted iconectiv LLC to act as the Secure Telephone Identity Governance Authority (“STI-GA”);³ and
 - iconectiv follows approved certification guidelines to appoint Secure Telephone Identity Certification Authorities (“STI-CAs”) which, in turn, issue certificates to authorized voice service providers.⁴ We understand that, to date, six for-profit providers that are independent of voice service providers have been accredited as U.S. STI-CAs (Metaswitch, NetNumber, Neustar, Peeringhub, Sansay, and Transnexus).⁵
5. We further note that, even before the above-noted Public Notice, the U.S. system granted far broader access to voice service providers precisely because direct access to telephone numbers there is—like access to Autonomous System numbers and associated Internet Protocol addresses—widespread.⁶
6. This further difference underlines the narrow ambit of a Canadian approach that would be more restrictive, not only than the revised approach recently adopted in the U.S., but also than the previous approach which the FCC deemed unduly constricted. Notwithstanding calls such as, most recently, that of the Yale Report, to broaden access to numbering resources,⁷ such access remains unavailable to many competitive providers of voice services that are regulated by the CRTC.⁸ Because non-CLECs can access telephone numbers only through an intermediary they, as Mitel has

² *STIR/SHAKEN Caller ID Authentication Governance Framework Revised*, Public Notice FCC DA 20-1374, 18 November 2020.

³ ATIS, “STI-GA Executes iconectiv Contract as Secure Telephone Identity Policy Administrator” (press release), 27 August 2019.

⁴ SHAKEN Policy Administrator, *Secure Telephone Identity (STI) Certification Authority Methods and Procedures*, STI-PA Release 1.4, STI-PA-US-METHODPROCCA-001 Issue 3, April 2020 citing, in particular, *SHAKEN Governance Model and Certificate Management* (ATIS-1000080) and *Technical Report on Operational and Management Considerations for SHAKEN STI Certification Authorities and Policies Administrators* (ATIS-1000084).

⁵ Online: <<https://authenticate.iconectiv.com/approved-certification-authorities>>.

⁶ *In the Matter of Numbering Policies for Modern Communications, IP-Enabled Services, and Telephone Number Requirements for IP-Enabled Services Providers et al.*, Report and Order FCC 15-70, 18 June 2015.

⁷ Broadcasting and Telecommunications Legislative Review Panel, *Canada’s Communications Future: Time to Act* (Ottawa, 2020), recommendation 33 (“We recommend that direct access to numbering resources be broadened to all existing and prospective electronic communications service providers that are within the jurisdiction of the Telecommunications Act”), on the following basis (at section 2.3):

A competitively neutral marketplace, over which the CRTC maintains clear regulatory authority regardless of service providers’ domicile, will enhance innovation and improve competition, including service-based competition. It is therefore time to unlink access to numbering and addressing resources with the status of a local exchange carrier. The CRTC should review how to do so in a manner that ensures technological and competitive neutrality.

⁸ *Review of the reseller registration obligation*, Telecom Regulatory Policy CRTC 2019-354, 24 October 2019.

observed, will therefore be required eventually to sign voice communications with Delegate Certificates, once this becomes possible, rather than participate in an industry-wide scheme that enables broad competition for signed calls.

7. Canada's continuing laggard status in respect of phone number access should not poison our implementation of secure telephony, too. Carrying forward the existing distinction, in respect of telephone numbers, will result in an over-complicated, two-speed environment that takes even longer to rise to creaky feet, while significantly reducing competition for secure telephony by excluding the smallest and nimblest service providers from the core marketplace, some of whom are among the industry's most innovative. In the meantime, any distinction based on mapping CLEC to facilities-based and non-CLEC to non-facilities-based providers has long sailed, as most new CLECs today are constructed out of leased network facilities in the same way that other new voice service providers are.
8. The Canadian Voice Peering Project **supports** Mitel's application. With respect to its implementation, in order both to handle the larger volume of accreditations and to assure the sector's stewardship going forward, the CVPP **encourages** both the Commission and industry participants to:
 - a) see to the emergence of a mature ecosystem in which, in the future, a
 - i. not-for-profit Governance Authority continues to work with
 - ii. a separated Policy Authority within Canada that is experienced in authenticating downstream registrars, in order to
 - iii. foster a robust and dynamic domestic Certificate Authority ecosystem including both for-profit and not-for-profit entities engaged in the commercial activity of awarding certificates to voice service providers who meet the well-defined criteria; and
 - b) consider participating, for the better health of the Canadian PSTN as a whole, in direct interconnection through projects such as the CVPP, contact details for which are included in this submission.
9. The Canadian Voice Peering Project thanks the Commission for the opportunity to participate in this proceeding. We look forward to reviewing the interventions of other participants, Mitel's reply, and the Commission's decision in this matter.

Yours sincerely,

[filed electronically]

Scott Silzer

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David Deutsch, Mitel Networks Corp. (dave.deutsch@mitel.com).

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