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Filed via My CRTC Account

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

8 February 2021

Re: Part 1 Application by Mitel Requesting that the Commission instruct the Canadian Secure Token Governance Authority to allow all LECs to participate in STIR/SHAKEN (CRTC File 8638-M75-202008953) – Intervention of TekSavvy Solutions Inc.

Dear Mr. Doucet:

1. TekSavvy Solutions Inc. (“TekSavvy”) is pleased to have this opportunity to support the Part 1 Application of Mitel Cloud Services, Inc. (“Mitel”) requesting that the Commission instruct the Canadian Secure Token Governance Authority to allow all LECs to participate in STIR/SHAKEN (“Mitel Part 1”) which ultimately supports the Commission’s objective for all Telecommunications Service Providers (“TSPs”) to implement STIR/SHAKEN.
2. In Compliance and Enforcement and Telecom Decision CRTC 2018-32,¹ the Commission determined that the telecommunications industry needed a Canadian administrator for issuing certificates required to authenticate and verify IP-based calls. In response, the Canadian LNP Consortium Inc. (“CLNPC”)—primarily composed of the large incumbent carriers—submitted a proposal to the Commission. The proposal outlined the eligibility requirements to become a shareholder in the Canadian Secure Token Governance Authority (“CSTGA”).

¹ Compliance and Enforcement and Telecom Decision CRTC 2018-32 *Measures to reduce caller identification spoofing and to determine the origins of nuisance calls*, 25 January 2018, available at: <https://crtc.gc.ca/eng/archive/2018/2018-32.htm>.

3. The Commission then issued two decisions in December 2019, advancing the implementation of STIR/SHAKEN² and approving the proposal put forward by the CLNPC to act as the CSTGA, the body that is responsible for overseeing the Policy Administrator and Certificate Authority (Neustar) and the implementation of STIR/SHAKEN.³
4. As Mitel points out, one of the policy issues that has implications for voice service resellers is the fact that only those TSPs that obtain numbers directly from the numbering authority are eligible to participate as a shareholder in the CSTGA. In other words, only Canadian Carriers with direct access to telephone numbers are eligible to participate in the CSTGA,⁴ allowing Carriers to obtain certificates for calls.
5. All other TSPs who do not have direct access to Canadian telephone numbers need to get a Delegate Certificate from the entity that supplies the numbers to them. This will primarily affect resellers as they will have to obtain solutions that currently are not available and, ultimately, may not be able to obtain “A” level attestation for all calls. As Mitel elaborates in its Part 1 application, there are notable problems with the Delegate Certificate process. Most importantly, the underlying Carrier that supplies the TSP with numbers may choose not to provide the TSP with Delegate Certificates.⁵ In short, the barriers that Mitel identified may ultimately prevent resellers from implementing STIR/SHAKEN.
6. Mitel and TekSavvy have both been active participants in the CISC Network Working Group. Mitel raised their concerns with the Working Group. Solving the identified problem engages a policy matter and therefore does not appear to currently be in scope for the Working Group. However, as Mitel notes, the Working Group has drafted a document that will soon be provided to the Commission, the *Framework for STIR/SHAKEN in Canada, Status Report*, that will include a description of the problems with the delegate certificate solution.⁶
7. As explained above, that delegate certificate solution is insufficient to address the concerns of voice service resellers. Instead, the eligibility requirements for the CSTGA must be changed to allow resellers to be shareholders and therefore to also get certificates directly.
8. In order to address this issue and expand eligibility for certificates to resellers, the Commission must provide the CSTGA with direction on this matter.

² Compliance and Enforcement and Telecom Decision CRTC 2019-402 *CISC Network Working Group – Status of implementation by telecommunications service providers of authentication/verification measures for caller identification*, 9 December 2019, available at: <https://crtc.gc.ca/eng/archive/2019/2019-402.htm> [“CETD 2019-402”]

³ Compliance and Enforcement and Telecom Decision CRTC 2019-403 *Establishment of the Canadian Secure Token Governance Authority*, 9 December 2019, available at: <https://crtc.gc.ca/eng/archive/2019/2019-403.htm> [“CETD 2019-403”].

⁴ As noted on the CST-GA website <https://cstga.ca/eligibility/> .

⁵ Mitel Part 1, at para 13.

⁶ Mitel Part 1, at para 11.

9. In conclusion, the Delegate Certificate solution poses considerable challenges for competitors and resellers and consequently, all TSPs might not be able to implement STIR/SHAKEN. TekSavvy supports Mitel's request in its Part 1 application. Given that the Commission's objective has always been for all TSPs to implement STIR/SHAKEN, the Commission ought to reaffirm its determination and direct the CSTGA to allow all TSPs to be able to receive certificates directly from Neustar.

Yours truly,

[transmitted electronically]

Andy Kaplan-Myrth
VP, Regulatory & Carrier Affairs

cc: Victoria Martin, Mitel <vmartin@telecomcounsel.com>;
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