



May 16, 2022

ATIS/SIP Forum NNI Task Force  
733 Turnpike Street, Suite 192  
North Andover, MA 01845

Dear Members of the ATIS/SIP Forum NNI Task Force,

The American Bankers Association, ACA International, American Financial Services Association, Credit Union National Association, Mortgage Bankers Association, National Association of Federally-Insured Credit Unions, National Council of Higher Education Resources, and Student Loan Servicing Alliance (collectively, the Associations)<sup>1</sup> appreciate the opportunity to provide feedback on the standard that the ATIS/SIP Forum NNI Task Force (Task Force) is developing for telephone companies that block calls and their analytics providers (collectively, Voice Service Providers or Providers) to use Session Initiation Protocol (SIP) Code 603 to notify the caller that its call has been blocked.

As you know, SIP Code 603 was initially designed to signal that the recipient “decline[d]” the call.<sup>2</sup> In the Federal Communications Commission’s (Commission) Order on Reconsideration issued on December 30, 2021,<sup>3</sup> the Commission permitted Voice Service Providers to use SIP Code 603, in addition to SIP Codes 607 or 608, to satisfy the Commission’s requirement promulgated in 2020 that a Provider immediately notify callers when it has blocked the caller’s call.<sup>4</sup> We have expressed concern to the Commission that, under the Order, a caller receiving a SIP Code 603 response would not be able to understand whether the response code signaled that the call’s recipient declined the call or that the Provider blocked the call in the network.<sup>5</sup>

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<sup>1</sup> A description of each Association is provided in the Appendix.

<sup>2</sup> Internet Engineering Task Force, *SIP: Session Initiation Protocol* 191 (2002), <https://datatracker.ietf.org/doc/html/rfc3261#page-192> [hereinafter, IETF Session Initiation Protocols].

<sup>3</sup> *Advanced Methods To Target and Eliminate Unlawful Robocalls*, Order on Reconsideration, CG Docket No. 17-59, 86 Fed. Reg. 74,373 (2021).

<sup>4</sup> *Advanced Methods To Target and Eliminate Unlawful Robocalls*, Fourth Report and Order, CG Docket No. 17-59, 86 Fed. Reg. 17,726, 17,729-30 (2021).

<sup>5</sup> See, e.g., *Advanced Methods To Target and Eliminate Unlawful Robocalls*, Partial Opp. & Comments of the Am. Bankers Ass’n *et al.* to the Pet. for Recons. & Request for Clarification of USTelecom, CG Docket No. 17-59 (Jun.

We understand that the Task Force is developing an enhanced version of SIP Code 603 (SIP Code 603+) that would allow the caller to distinguish between a 603+ Code that indicates the called party declined the call from the receipt of a 603+ Code that signals that the Voice Service Provider blocked the call. In response to your suggestion that the Associations identify issues important to the calling community when receiving blocking notification, we provide the following:

1. SIP Code 603+ must utilize a uniform, standard word or phrase in the header of the code that clearly indicates that the call has been blocked in the network based on the use of analytics. The current iteration of the Task Force’s base document for the standard for SIP Code 603+ suggests using the reason phrase “Network Blocked” for this purpose.<sup>6</sup> It should be made clear, including through a revision of documentation for SIP Code 603 maintained by the Internet Engineering Task Force (IETF) (the body that sets generic standards for internet protocols) that Providers blocking calls in the network based on analytics shall use only a standardized uniform reason phrase.
2. The standard for a 603+ Code must enable the code to be read using automated, machine-readable technology.
3. It should be clear that a 603+ Code without a reason header signifies the called party has declined the call, per existing IETF documentation.<sup>7</sup> A 603+ Code with the uniform standard reason phrase shall signify network blocking by analytics. A 603+ Code should not be used for any other purpose.
4. The reason header must include, in standardized formats, the name and contact information for the blocking entity.
5. The standard for SIP Code 603+ should address, to the extent practicable, the transmission of the 603+ Code across international boundaries. Specifically, SIP Code 603+ must be able to provide effective notification in the following instances: (1) where the caller is located in the United States, and the call recipient is located outside the U.S.; (2) where a U.S. company caller placed the call from a location outside of the U.S. to a recipient outside the U.S.; (3) where a U.S. company caller placed the call from a location outside of the U.S. to a recipient inside the U.S.; (4) where a U.S. company caller placed the call from a location within the U.S. to a recipient within the U.S., but the call was blocked by an intermediary provider that is located outside of the U.S.; and (5) where the subsidiary of an international Voice Service Provider that is providing services in the U.S. blocks a call.

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4, 2021), <https://www.aba.com/advocacy/policy-analysis/joint-trades-comment-on-ustelecom-petition-on-call-blocking>.

<sup>6</sup> Alliance for Telecommunications Industry Solutions, *Draft ATIS Standard on Robocall Call Blocking Notification*, 2, § 4.1 (last visited May 16, 2022), [https://access.atis.org/apps/group\\_public/download.php/64561/IPNNI-2022-00033R002.docx](https://access.atis.org/apps/group_public/download.php/64561/IPNNI-2022-00033R002.docx).

<sup>7</sup> See IETF Session Initiation Protocols, *supra* note 2, at 191.

6. The standard for SIP Code 603+ should address which entity should receive notification where a third party initiates the call on behalf of a customer, for example, where a call center it utilized.
7. To the extent practicable, the standard for SIP Code 603+ should consider cost of deployment and implementation by small carriers and both large and small enterprise callers.
8. The standard for SIP Code 603+ should ensure that callers' calling applications are able to interrogate the header on the 603+ Code. Currently, the response codes that callers receive (SIP "call traces") are cumbersome for callers to examine, and callers' calling applications will need to be re-programmed so that they interrogate the header of the response codes.

Thank you for consideration of these views. We look forward to continued discussion of the standards for SIP Code 603+.

Sincerely,

American Bankers Association  
ACA International  
American Financial Services Association  
Credit Union National Association  
Mortgage Bankers Association  
National Association of Federally-Insured Credit Unions  
National Council of Higher Education Resources  
Student Loan Servicing Alliance

## APPENDIX

The American Bankers Association is the voice of the nation's \$23.7 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard \$19.7 trillion in deposits and extend \$11.2 trillion in loans.

ACA International is the leading trade association for credit and collection professionals. Founded in 1939, and with offices in Washington, D.C. and Minneapolis, Minnesota, ACA represents approximately 3,000 members, including credit grantors, third-party collection agencies, asset buyers, attorneys, and vendor affiliates in an industry that employs more than 230,000 employees worldwide. As part of the process of attempting to recover outstanding payments, ACA members are an extension of every community's businesses. Without an effective collection process, businesses and, by extension, the American economy in general, is threatened. Recovering rightfully-owed consumer debt enables organizations to survive, helps prevent job losses, keeps credit, goods, and services available, and reduces the need for tax increases to cover governmental budget shortfalls.

The American Financial Services Association (AFSA) is the national trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with closed-end and open-end credit products including traditional installment loans, mortgages, direct and indirect vehicle financing, payment cards, and retail sales finance.

The Credit Union National Association, Inc. (CUNA) is the largest trade association in the United States serving America's credit unions and the only national association representing the entire credit union movement. CUNA represents nearly 5,500 federal and state credit unions, which collectively serve 120 million members nationwide. CUNA's mission in part is to advocate for responsible regulation of credit unions to ensure market stability, while eliminating needless regulatory burden that interferes with the efficient and effective administration of financial services to credit union members.

The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry that works to ensure the continued strength of the nation's residential and commercial real estate markets, to expand homeownership, and to extend access to affordable housing to all Americans.

The National Association of Federally-Insured Credit Unions (NAFCU) advocates for all federally-insured not-for-profit credit unions that, in turn, serve nearly 124 million consumers with personal and small business financial service products. NAFCU provides its credit union members with representation, information, education, and assistance to meet the constant challenges that cooperative financial institutions face in today's economic environment. NAFCU proudly represents many smaller credit unions with relatively limited operations, as well as many of the largest and most sophisticated credit unions in the nation. NAFCU represents 77 percent of total federal credit union assets, 56 percent of all federally-insured credit union assets, and 74 percent of all federal credit union member-owners.

The National Council of Higher Education Resources' mission is to provide superior advocacy, communications, regulatory analysis and engagement, and operational support to its members so they may effectively help students and families develop, pay for, and achieve their career, training, and postsecondary educational goals.

The Student Loan Servicing Alliance (SLSA) is the nonprofit trade association that focuses exclusively on student loan servicing issues. Our membership is responsible for servicing over 95% of all federal student loans and the vast majority of private loans, and our membership is a mix of companies, state agencies, non-profits and their service partners. Our servicer members and affiliate members provide the full range of student loan servicing operations, repayment support, customer service, payment processing, and claims processing for tens of millions of federal and private loan borrowers across the country.