



martini
security

Martini Security

June 2022 - Required Regulatory Filings for STIR/SHAKEN

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1. EXECUTIVE SUMMARY

Martini Security Systems has developed Vermouth, which enables both full attestation of outbound call metadata as well as call metadata verification. Vermouth also supports the acquisition automatic and management of the required digital certificates.

This solution was designed to provide a turn-key solution to STIR/SHAKEN compliance and in our experience can be deployed in hours once all associated regulatory filings have been completed.

This document provides a step-by-step walk-through of the needed regulatory filings.

DISCLAIMER: All details presented in this document are for informational purposes only and do not constitute any form of legal or regulatory advice.

STEP 1. Registering with the Robocall Mitigation Database

| Estimated time to complete: 1-2 days |

The Federal Communications Commission (FCC) requires all voice service providers to file certifications in the Robocall Mitigation Database regarding their efforts to fight illegal robocalls on their networks.

Voice service providers were obligated to submit certifications via the filing portal no later than June 30, 2021. If you did not meet this deadline and still need to file you can find the associated instructions here: <https://www.fcc.gov/sites/default/files/rmd-instructions.pdf>

STEP 2. Registering for a 499 ID / Becoming a 499 Filer

| Estimated time to complete: 2-4 days |

ALL service providers should already be filing a 499 with USAC as required. If you do not have a 499 filer ID and are not filing 499s as required by the FCC you are in violation and should immediately contact your regulatory attorney to resolve this.

STEP 3. Acquiring an Operating Company Number (OCN)

| Estimated time to complete: 1-2 weeks |

Not all service providers have an OCN and unfortunately, staffing has not grown to support the number of filings required by STIR/SHAKEN. As such if you have not acquired your OCN yet we recommend you do so immediately as it may be the longest wait time item on your journey to STIR/SHAKEN compliance.

You can request your OCN registration here:

<https://www.neca.org/business-solutions/company-codes/company-code-request-instructions>

At the bottom of this page, there is a download link “Company Code request form” –download and complete this form.

The type of service should be IPES –Internet Protocol Enabled Services.

You will need to provide an interconnection agreement with the application.

There is a one-time, \$425 filing fee but for \$550 you can have the filing expedited. This can be paid in several ways, all explained on the NECA request instructions page.

The NECA site will explain specifically what documentation is required to properly submit the application for an OCN.

STEP 4. Applying as an Authorized Service Provider with the STI-PA

Once you have acquired an OCN you must register with the STI-PA. Again, failure to be proactive could result in delays due to staffing at the STI-PA. The current STI-PA is administered by IConnectiv.

Iconnectiv's site has a registration process for Service Providers you can find here:

<https://authenticate.iconectiv.com/service-provider-authenticate>

Click the large "Begin Registration" button. There is a simple form here to complete, you will need your OCN for this form.

The next screen will request some documentation that you should have already, as well as revenue figures from your most recent 499A filing.

The next steps will require a little email back and forth with the STI-PA admin team. There is also a sandbox environment certification test that requires you to run a simple test to verify that everything works as expected.

Congratulations! You have completed the needed regulatory filings and can finally begin with your implementation. We have created a set of tools that will make it easy for you to get up and running with a reliable, scalable, and low-maintenance STIR/SHAKEN solution.

To get started visit our website at: <https://martinisecurity.com/vermouth>.