



# **Branded Calling ID™**

## **Best Practices**



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## Glossary

Term	Description
<b>Branded Calling ID™</b>	A CTIA service that allows a Registrant to register a vetted and validated Caller Display Name, Call Logo, and Call Reason so that a call may display such information on a Consumer's telephone when the Caller calls the Consumer.
<b>Caller</b>	An entity that calls a Consumer using Branded Calling ID. A Caller can also be a Registrant.
<b>Caller Display Name</b>	The name that displays on a Consumer's phone when a call is successfully made using Branded Calling ID.
<b>Caller Information</b>	Information requested by a Vetting and Validation Agent and submitted by a Registrant or an Onboarding Platform that allows: (1) a Vetting and Validation Agent to successfully vet and validate a Caller for Branded Calling ID (including Caller Display Name, Call Logo, and Call Reason), and (2) a Consumer to trust the call's source. Caller Information includes but is not limited to a Caller's company name, company website, federal employer ID number ("FEIN"), Caller Display Name, Call Logo, and Call Reason and billing contact and address.
<b>Call Logo</b>	The image that displays on a Consumer's phone when a call is successfully made using Branded Calling ID (e.g., a Caller's brand logo, text, or a design). A Caller must assert proprietary trademark rights over the Call Logo, and the Call Logo must be registered with the United States Patent and Trademark Office (USPTO).
<b>Call Reason</b>	The text that displays on a Consumer's phone when a call is successfully made using Branded Calling ID and describes the reason for the call.
<b>Consumer</b>	An individual person who subscribes to services provided by a Voice Service Provider.
<b>Onboarding Platform</b>	An entity that submits Caller Information to the Vetting and Validation Agent to be vetted and validated for the purposes of Branded Calling ID.
<b>Registered Caller</b>	A centralized telephone number registry that helps mitigate illegal and unwanted robocalls by verifying Caller Information and validating the telephone numbers associated with the Caller. Registered Caller is an example of a Vetting and Validation Agent for purposes of Branded Calling ID.
<b>Registrant</b>	An entity that registers a Caller with: (1) an Onboarding Platform for the purposes of vetting and validating Caller Display Name, Call Logo, and Call Reason so that the Caller may use Branded Calling ID; or (2) A Vetting and Validation Agent for the purposes of vetting and validating Caller Information and associated telephone numbers. A Registrant may be a Caller acting on its own behalf or a third party acting on the Caller's behalf.
<b>SHAFT Content</b>	Content that contains or promotes sex, hate, alcohol, firearms, or tobacco.
<b>Vetting and Validation Agent</b>	An entity that executes a Vetting and Validation Agency Agreement with CTIA or Voice Service Provider and performs vetting and validation services for purposes of Branded Calling ID.
<b>Voice Service Provider</b>	An owner or operator of telephone or data networks that offers Consumers a wide variety of voice communications products and services and has an agreement with CTIA for purposes of Branded Calling ID.

# Introduction

All parties participating in Branded Calling ID should adhere to the Branded Calling ID Best Practices (“BCBP”), which are intended to:

- Establish an interoperable and transparent ecosystem and promote the best possible experience for Consumers, Registrants, Callers, and Voice Service Providers;
- Deliver guidelines that clearly communicate compliant Branded Calling ID practices;
- Enable the industry to self-regulate the implementation and administration of Branded Calling ID; and
- Facilitate enforcement measures, if necessary, to rapidly and reliably protect Consumers consistently.

CTIA and individual Voice Service Providers reserve the right to take action against any Registrant or Caller deemed to cause harm to Consumers, including as applicable suspension or termination from Branded Calling ID or blocking the delivery of any Brander Calling ID content.

## Guiding Principles

To engender and preserve Consumer trust in Branded Calling ID, the BCBP contain best practices that parties should follow when using Branded Calling ID. These best practices are guided by a few basic, overarching principles:

1. Callers may not use Branded Calling ID to deceive or mislead Consumers.
2. Callers may not use Branded Calling ID for illegal purposes.
3. A Voice Service Provider retains authority to deviate from the BCBP with respect to calls that terminate in its network.

More detail regarding the best practices can be found below. Stakeholders are encouraged to read the BCBP before participating in Branded Calling ID. From time to time, the BCBP may be updated to reflect new, emerging use cases within the call display ecosystem.

## Scope, Limitations, and Disclaimer of Legal Guidance or Advice

The BCBP do not constitute or convey legal advice and should not be used as a substitute for obtaining legal advice from qualified counsel. Use of and access to the BCBP or any of the links contained herein do not create an attorney-client relationship with CTIA.

Calling or voice services, including those that use Branded Calling ID, may be subject to a number of legal requirements, including those established under the Telephone Consumer Protection Act (“TCPA”); the CAN-SPAM Act; the Communications Act of 1934, as amended; the Federal Trade Commission (“FTC”) Act; and the regulations and decisions adopted by the Federal Communications Commissions (“FCC”) and FTC. Anyone using the BCBP should consider obtaining legal and regulatory advice prior to taking any action related to the use of Branded Calling ID.

As a set of voluntary best practices, the BCBP do not impose, prescribe, or require contractual or technical implementation obligations on ecosystem stakeholders, including Voice Service Providers. Due to contractual, technical, or other practical factors, methods of implementing the BCBP may vary among stakeholders. Stakeholders may choose to implement modified and additional requirements through their individual guidelines, policies, or contracts.

# Registration

To use Branded Calling ID, Callers must submit Caller Information for vetting and validation to an Onboarding Platform.<sup>1</sup> The Onboarding Platform will then submit the Caller Information to a Vetting and Validation Agent to be vetted and validated.

The Caller Display Name, Call Logo, and Call Reason to be displayed using Branded Calling ID must be vetted and validated by a Vetting and Validation Agent.

Registered Caller is one example of a Vetting and Validation Agent.<sup>2</sup> A Vetting and Validation Agent simplifies the telephone number and Branded Calling ID vetting and validation process for Callers and Voice Service Providers by:

- Supporting integration with Secure Telephone Identity Revisited (“STIR”) and Signature-based Handling of Asserted information using toKENs (“SHAKEN”) (collectively, “STIR/SHAKEN”);
- Creating a verified relationship between Callers, their telephone numbers, and the Caller Display Name, Call Logo, and Call Reason;
- Providing easy bulk telephone number upload capability; and
- Providing a central platform with standardized data fields and industry-wide scalability.

## Caller Account Vetting and Validation

### Caller Information

So that a Caller’s identity and the Caller Information may be vetted and validated, Registrants must provide the following Caller Information, unless expressly noted as optional with a (\*) below:

1. Organization Name
2. Organization Website
3. Organization Type
4. Dun & Bradstreet Number (“DUNS”) OR Federal Employer ID Number (“FEIN”)
5. Billing Contact and Address
6. Authorizer Name and Email<sup>3</sup>
7. Primary Business Domain (SIC Code)\*
8. Corporate Registration Number\*
9. Professional License Number\*

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1. For the purposes of the BCBP, if a Caller submits Caller Information directly to an Onboarding Platform, the Caller is the Registrant. If a Caller relies on a third party to submit Caller Information to an Onboarding Platform, the third party is the Registrant. In either scenario, the Registrant interacts with the Onboarding Platform.

2. Registered Caller is a centralized telephone number registry that helps mitigate illegal and unwanted robocalls by verifying Caller Information and validating the telephone numbers associated with the Caller.

3. “Authorizer” refers to the individual point of contact for the Caller or Caller’s authorized agent. The email should be the individual’s work email address, not a personal email address. If the Caller uses an authorized agent, the parties must submit evidence that the Caller has authorized the agent to serve as Authorizer.

10. Caller Display Name

11. Call Logo\*

12. Call Reason\*

Registrants must submit accurate and true Caller Information. The submitted Caller Information allows a Vetting and Validation Agent to vet and validate a Caller and allows a Consumer to trust the call's source.

### **Validating Telephone Numbers**

In addition to providing the Caller Information, Registrants will need to successfully validate the telephone numbers that a Caller wishes to use by demonstrating that the submitted telephone numbers are actually associated with the Caller.

To do so, Registrants must submit the following information either directly to a Vetting and Validation Agent or to an Onboarding Platform that utilizes a Vetting and Validation Agent:

- A complete list of the telephone numbers that the Caller wishes to have vetted and validated against third-party databases and sources.
- A representation and warranty that the Caller has the requisite rights to the telephone numbers the Caller wishes to use.
- A representation and warranty by the Registrant that it has the requisite rights to submit the telephone numbers and act on the Caller's behalf.

To confirm telephone numbers are correctly associated with a Caller and can be successfully validated, Registrants and Onboarding Platforms will comply with audit requests from the Vetting and Validation Agent.

### **Validating Caller Display Name, Call Logo, and Call Reason**

Registrants will need to successfully validate the Caller Display Name, Call Logo, and Call Reason that a Caller wishes to use by demonstrating that the submitted Caller Display Name, Call Logo, and Call Reason are actually associated with the Caller and otherwise do not contain SHAFT Content.

To do so, Registrants must submit the following information either directly to a Vetting and Validation Agent or to an Onboarding Platform that utilizes a Vetting and Validation Agent:

- A complete list of the Caller Display Names, Call Logos, and Call Reasons that the Caller wishes to have vetted and validated against third-party databases and sources.
- A representation and warranty that the Caller has the requisite rights to Caller Display Names, Call Logos, and Call Reasons the Caller wishes to use.
- A representation and warranty by the Registrant that it has the requisite rights to submit the Caller Display Names, Call Logos, and Call Reasons and act on the Caller's behalf.

To confirm Caller Display Name, Call Logo, and Call Reason are correctly associated with a Caller and can be successfully validated, Onboarding Platforms will comply with audit requests from the Vetting and Validation Agent.

The Caller Display Name is the Caller name that displays on a Consumer's phone when a call is successfully made using Branded Calling ID. When registering to use Branded Calling ID, a Registrant submits the Caller Display Name.

- The Caller Display Name should display the official legal name, brand name, or “doing business as” (“d/b/a”) name of the Caller or the Caller’s affiliate.
- The Caller Display Name shall be legally registered in at least one jurisdiction within the United States.
- The Caller Display Name shall not contain a hyperlink that allows the Consumer to: (1) navigate to a webpage; (2) begin drafting an email, SMS, OTT, or other message; or (3) take a separate action.
- The Caller Display Name shall not contain illegal content, including content that infringes any third party’s intellectual property rights (e.g., trademark, copyright).
- The Caller Display Name shall not be fraudulent, deceptive, or misleading to a Consumer.<sup>4</sup>
- The Caller Display Name shall not endorse violence, contain profanity, or contain hate speech.
- The Caller Display Name shall not contain SHAFT Content.<sup>5</sup>

## Call Logo

The Call Logo may be a Caller’s company or brand logo over which the Caller has asserted proprietary trademark rights through the United States Patent and Trademark Office (“USPTO”).

Call Logos will be vetted against third party trademark registries – including but not limited to the USPTO’s Trademark Electronic Search System (“TESS”), Trademark Now, and Clarivate – to confirm that the Caller has the requisite legal right to use the Call Logo.

## Call Reason

When registering to use Branded Calling ID, a Registrant may choose the Call Reason from a preapproved list of Call Reasons or select a custom Call Reason, which allows the Caller to choose the precise text that is displayed, subject to certain technical restraints and the guidelines in the BCBP.

If a Registrant elects to register a custom Call Reason, the Call Reason shall contain 35 or fewer characters.<sup>6</sup> The custom Call Reason should adhere to the best practices discussed in the bullet points above and may be subject to additional review by a Vetting and Validation Agent or Voice Service Providers to ensure that the custom Call Reason complies with the BCBP.

## Updating Caller Account Information

A Registrant or Onboarding Platform shall update the Caller Information listed under “Vetting Caller Information” above as soon as possible from the time of change.

## Deleting a Caller Account

To delete a Caller account, a Registrant or Onboarding Platform must send an email to -support@brandedcallingid.com. Deleting a Caller account will remove associated telephone numbers, Caller Display Names, Call Logos, and Call Reasons from the Vetting and Validating Agent.

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4. A Caller Display Name is “deceptive” or “misleading” if it makes a material representation or omission that likely would affect a reasonable Consumer’s decision to answer the phone call. If the Caller intended the Caller Display Name to be deceptive or misleading, then it would be “fraudulent.” Notwithstanding this best practice must be followed by all participants in the Branded Calling ID ecosystems, it is understood that the Vetting Agent will not be monitoring actual voice call content.

5. If a Caller Display Name is flagged as containing SHAFT Content during the vetting process, the Caller Display Name may be subject to additional review before being validated.

6. ATIS 1000067, 2015 Edition, August 2015 - IP NGN Enhanced Calling Name (eCNAM). The number of characters for the Call Reason is subject to each Original Equipment Manufacturers (“OEM”) respective limits.

## Notification of Vetting and Validation

Registrants will receive notice of whether the vetting and validation process is successful or unsuccessful.

Specifically, a Vetting and Validation Agent will indicate to the Onboarding Platform whether the Caller Information has been successfully vetted and validated. The Onboarding Platform will then indicate to the Registrant whether the Caller Information has been successfully vetting and validated.

- If the Caller vetting and validation process is successful, the Caller's status will indicate that it is "Verified."
- If the Caller vetting and validation process is unsuccessful, the Caller's status will indicate that it is "Unsuccessful."

A Vetting and Validation Agent will send an email to Onboarding Platform indicating the Caller's verification status at the email address provided by the Onboarding Platform.

When vetting and validating Caller Information, the Vetting and Validation Agent will evaluate the risk of the Caller and, if applicable, assign one of the following categories:

The assignment of one of the categories to the Caller in the chart above will result in unsuccessful vetting and validation. Registrants will have an opportunity to cure Caller Information and telephone number information, as described on the following page.

# Categories for Unsuccessful Entity Vetting and Validation

Category	Description
<b>High Risk</b>	Indicates that Caller displays characteristics of fraud, has misrepresented data, or has undergone (or is in the process of undergoing) indictment.
<b>Misrepresentation Check</b>	Likely significant or acute business risk where the Caller has shown signs of material malfeasance and misrepresentation, either through the fabrication, exaggeration, or omission of data as verified through research by data sources, including other third-party sources and/or local authorities. Often includes, but is not limited to, material misrepresentation (i.e., financial statements), start-dates, use of aged shell corporations, take-over of another's business credentials, victims with actual or potential losses (i.e., bad debt or payment losses).
<b>Government Control Lists</b>	Caller has been identified on a government control list such as Office of Foreign Assets Control ("OFAC"), terrorist, or other debarment lists.
<b>Theft Impersonation</b>	It has been reported or determined that an unauthorized use of a Caller's business information has likely occurred.
<b>Business Deterioration</b>	Indicates that Caller shows signs of financial distress, such as existing or imminent business failure or operating difficulty. Events that likely have significant impact to operations (i.e., higher likelihood of material negative event/year) include bankruptcy, out of business, judgment, bills unpaid, natural disasters, fires, material workforce reductions, an accountant's opinion on ability to operate as a going concern or "do-not-rely-upon" prior financial statements, failure to timely file required financial information.
<b>Other Risks</b>	Caller possesses characteristics associated with a high-risk business, including high credit, size of business, other financial distress indicators (e.g., high number of inquiry rates), newsworthy items (e.g., crimes of deception, TCPA violations), or provides telephone numbers that are not correctly associated with the Caller or cannot be validated as associated with the Caller, etc.

## Notice of Unsuccessful Verification and Opportunity to Cure

If an attempted Branded Calling ID registration is not validated by the applicable Vetting and Validation Agent, the Vetting and Validation Agent will send an Unsuccessful Verification Notice to the Onboarding Platform. The Unsuccessful Verification Notice will include the Registrant, the Caller's phone number(s), and an explanation of why the attempted registration was unsuccessful. Registrants will have the opportunity to cure, and may submit missing or new information in order to address the issue(s) identified in the Unsuccessful Verification Notice and may complete a successful registration.

## Branded Calling ID Elements

Branded Calling ID allows a Caller to choose what appears on a Consumer's phone display. To do so, Branded Calling ID relies on a Caller Display Name, Call Logo, and Call Reason. Conveyance of Branded Calling ID information requires that a call has been designated with "A" level attestation under the STIR/SHAKEN standards.<sup>7</sup> Entities that participate in the conveyance of Branded Calling ID information (e.g., Call Placement Service (CPS) as defined by STIR/SHAKEN) are required to have been properly vetted through a Vetting and Validation Agent.

These three components of Branded Calling ID are subject to certain best practices to ensure that Branded Calling ID provides an innovative, efficient, accessible<sup>8</sup>, and trustworthy means for Callers to communicate with Consumers. The best practices are described in further detail below.

The three components will be associated with a Caller's validated telephone numbers. A validated telephone number may have multiple Call Reasons, Caller Display Name, and Call Logo.

Notably, the three components listed above must be vetted and validated by a Vetting and Validation Agent to properly display on a Consumer's telephone. One, two, or all three of the vetted and validated components may be displayed when placing a call.

### Caller Display Name

The Caller Display Name is the Caller name that displays on a Consumer's phone when a call is successfully made using Branded Calling ID. When registering to use Branded Calling ID, a Registrant submits the Caller Display Name.

- The Caller Display Name shall display the official legal name, brand name, or "doing business as" ("d/b/a") name of the Caller or the Caller's affiliate.
- The Caller Display Name shall be legally registered in at least one jurisdiction within the United States.
- The Caller Display Name shall not contain a hyperlink that allows the Consumer to: (1) navigate to a webpage; (2) begin drafting an email, SMS, OTT, or other message; or (3) take a separate action.

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7. Please visit the IETF for more information on STIR and ATIS for more information on SHAKEN. See IETF, Secure Telephone Identity Revisited, <https://datatracker.ietf.org/wg/stir/about/>; ATIS, STI Governance Authority, <https://sti-ga.atis.org/>.

8. Branded Calling ID should be accessible to and usable by individuals with disabilities or compatible with assistive technologies, if readily achievable. For example, parties participating in Branded Calling ID should ensure their solutions can use the accessibility features native to the mobile operating systems for [Apple's iOS](#) and [Google's Android](#). Parties participating in Branded Calling ID should engage people with disabilities to test these capabilities before deploying or modifying their solutions. Parties participating in Branded Calling ID also should not install network features, functions or capabilities that remove or hinder the accessibility of Branded Calling ID. These best practices are intended to be read consistent with Part 6 of the Federal Communications Commission's accessibility obligations, 47 CFR Part 6.

- The Caller Display Name shall not contain illegal content, including content that infringes any third party’s intellectual property rights (e.g., trademark, copyright).
- The Caller Display Name shall not be fraudulent, deceptive, or misleading to a Consumer.<sup>9</sup>
- The Caller Display Name shall not endorse violence, contain profanity, or contain hate speech.
- The Caller Display Name shall not contain SHAFT Content.<sup>10</sup>

## Call Logo

The Call Logo may be a Caller’s company or brand logo over which the Caller has asserted proprietary trademark rights through the United States Patent and Trademark Office (“USPTO”).

- The Call Logo shall not include illegal content, including content that infringes any third party’s intellectual property rights (e.g., trademark, copyright).
- The Call Logo shall not contain software designed to harm or exploit any programmable device, service, or network (e.g., malware), including but not limited to the Consumer’s device, service, or a Voice Service Provider’s network.
- The Call Logo shall not be fraudulent, deceptive, or misleading to a Consumer.<sup>11</sup>
- The Call Logo shall not endorse violence, contain profanity, or contain hate speech.
- The Call Logo shall not contain or relate to SHAFT Content.<sup>12</sup>
- The Call Logo shall not contain a hyperlink or QR code that allows the Consumer to: (1) navigate to a webpage; (2) begin drafting an email, SMS, OTT, or other message; or (3) take a separate action.

Call Logos will be vetted against third party trademark registries – including but not limited to the USPTO’s Trademark Electronic Search System (“TESS”), Trademark Now, and Clarivate – to confirm that the Caller has the requisite legal right to use the Call Logo.

## Call Reason

The Call Reason is the text that displays on a Consumer’s phone when a call is successfully made using Branded Calling ID. The Call Reason describes the reason for the call.

The Call Reason shall be selected from values that have been registered and vetted by the Vetting and Validation Agent.

The Call Reason should adhere to the following principles:

- The Call Reason shall accurately describe the intended reason for the call.
- The Call Reason shall not include illegal content, including content that infringes any third party’s intellectual property rights (e.g., trademark, copyright).

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9. See note 4.

10. See note 5.

11. A Call Logo is “deceptive” or “misleading” if it makes a material representation or omission that likely would affect a reasonable Consumer’s decision to answer the phone call. If the Caller intended the Call Logo to be deceptive or misleading, then it would be “fraudulent.”

12. If a Call Logo is flagged as containing SHAFT Content during the vetting process, the Call Logo may be subject to additional review before being validated.

- The Call Reason shall not contain a fraudulent, deceptive, or misleading message.<sup>13</sup>
- The Call Reason shall not endorse violence.
- The Call Reason shall not contain profanity or hate speech.
- The Call Reason shall not contain a hyperlink that allows the Consumer to: (1) navigate to a webpage; (2) begin drafting an email, SMS, OTT, or other message; or (3) take a separate action.
- The Call Reason shall not promote illegal drugs or substances or SHAFT Content.<sup>14</sup> The Call Reason should be appropriate for the intended audience.

If a Registrant has violated the BCBP, the Caller Information, Caller Display Name, Call Logo, or Call Reason will not be validated for purposes of Branded Calling ID registration, as described above.

## Contact Information for Additional Assistance

For any questions or additional assistance, stakeholders may email [BrandedcallingID@ctia.org](mailto:BrandedcallingID@ctia.org).

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13. A Call Reason is “deceptive” or “misleading” if it makes a material representation or omission that likely would affect a reasonable Consumer’s decision to answer the phone call. If the Caller intended the Call Reason to be deceptive or misleading, then it would be “fraudulent.”

14. If a Call Reason is flagged as containing SHAFT Content during the vetting process, the Call Reason may be subject to additional review before being validated.

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