



ADMINISTRATIVE COUNCIL FOR TERMINAL ATTACHMENTS

ACTA and Part 68: Past, Present, and Future

December 2021

ADMINISTRATIVE COUNCIL FOR
TERMINAL ATTACHMENTS

The ACTA

- The Administrative Council for Terminal Attachments (ACTA) is an open organization with a mission to:
 - (1) adopt technical criteria for terminal equipment to prevent network “harm” (as defined in 47 C.F.R. section 68.3) and HAC-compliant ACS telephonic CPE through the act of publishing such criteria developed by the American National Standards Institute (ANSI) accredited standards development organizations; and
 - (2) establish and maintain database(s) of equipment approved as compliant with the technical criteria.
- **The ACTA will not make substantive decisions regarding the development of technical criteria.**

What is Part 68?

- Per the [FCC's website](#), "Part 68 of the FCC rules (47 C.F.R. Part 68) governs the direct connection of Terminal Equipment (TE) to the Public Switched Telephone Network (PSTN). Also covered by Part 68 are TE that are connected to wireline facilities owned by wireline telecommunications providers and used to provide private line services. (See 47 C.F.R. § 68.100.)"
- As of October 2017, Part 68 also contains rules concerning Hearing Aid Compatibility and Volume Control (HAC/VC) for wireline telephones and for wireline phones used with advanced communications services, such as VoIP.

Preventing Harm to the Network Under Part 68

- Also, “Under Part 68, wireline telecommunications carriers must allow all TE to be directly connected to their networks, provided that the TE meets certain technical criteria for preventing four proscribed harms.”
 - Electrical hazards to operating company personnel.
 - Damage to network equipment.
 - Malfunction of billing equipment.
 - Degradation of service to customers other than the user of the TE and that person's calling and called parties.

Rules Contained in Part 68

- Provisions to protect consumers.
- Consumer access to competitive services.
- Rules concerning Hearing Aid Compatibility and Volume Control for telephones.
- Dialing frequency for automatic dialing machines.
- Source identification for fax transmissions.
- Technical criteria for inside wiring.

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Origins of Part 68 and the Formation of ACTA

- The origins of Part 68 go back to the beginning of electrical wireline communications in the 1800's.
- Two inventors stand out:
 - Samuel F.B. Morse – Electric Telegraph
 - Alexander Graham Bell – Voice Telephone
- The telephone business as we know today, began in 1968 with the FCC's approval of the Carterphone Decision.

Steps of the CarterPhone Decision

- 1966 – AT&T is sued to permit connection of Tom Carter’s circuit to the telephone network.
- 1968 – Court orders AT&T to establish tariffs that permit connection of customer owned premise equipment.
- 1969 – Development of a telephone interconnection policy is initiated.
- 1975 – Report and Order in Docket 19528 is released which leads to the interconnection of answering machines, toll restrictors, and data modems.
- 1977 – Part 68 Registration Program of telephones and other interconnected devices begins.

The FCC managed the Part 68 Registration Program until privatization and the establishment of ACTA in 2000.

William von Alven

- No man has done more for Part 68 than William von Alven, the “Father of Part 68”.
 - Member of the FCC Staff with over 25 Years of Dedicated Service to the Commission.
 - Manager of the FCC’s Part 68 program until his retirement in 1998.
 - Editor of “The Billboard”, a newsletter for Part 68 applicants.

Biennial Review of Part 68

- The Telecommunications Act of 1996 directed the Federal Communications Commission (FCC) to review its rules every even-numbered year and repeal or modify those found to be no longer in the public interest.
- Because of the rapid pace of change in both network and telephone equipment technologies, the FCC found it increasingly difficult for the regulatory process to keep pace thus creating a public disservice.

Formation of the ACTA

- The Administrative Council for Terminal Attachments (ACTA) was established pursuant to the Federal Communication Commission's (FCC) Report and Order in the 2000 Biennial Review of Part 68 of the Commission's Rules and Regulations, CC Docket No. 99-216, released December 21, 2000 (Order or R&O).
- The Order **privatized** the process by which technical criteria for the prevention of harm are established for customer premises or terminal equipment that may be sold for connection to the telephone network, and for the approval of such equipment to demonstrate compliance with the relevant technical criteria.
- The Order directed the industry, through the co-sponsorship and support of the Alliance for Telecommunications Industry Solutions (ATIS) and the Telecommunications Industry Association (TIA) to establish the ACTA as the open body that would assume the Federal Communication Commission's Part 68 role for those items privatized in the Order (47 C.F.R. section 68.602). The initial ACTA meeting was held on May 2, 2001.

Expansion of Part 68

- In October 2017, the FCC released new rules regarding Hearing Aid Compatibility (HAC) for wireline and wireless handsets.
- These rules expand the scope of Part 68 and require “responsible parties” for ACS telephonic CPE to register equipment in the ACTA database.

Registration of ACS Telephonic CPE

- The Report and Order and Order on Reconsideration, CG Docket No. 13-46WT, Docket No. 07-250WT, Docket No. 10-254, released October 26, 2017, amends Part 68 to apply, for purposes of HAC compliance, the same testing, attestations of compliance, registration, labeling, and complaint handling requirements that previously applied only to Customer Premises Equipment (CPE) directly connected to the public switched telephone network (PSTN) to advanced communications services (ACS) telephonic CPE such as Voice over Internet Protocol (VoIP) telephones.
- These rule amendments require “responsible parties” for ACS telephonic CPE to register such equipment in the ACTA terminal equipment database.
- Following implementation of these rules, the ACTA updated its database to allow for the inclusion of ACS telephone CPE.

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ACTA Responsibilities

- From its mission, the ACTA's responsibilities can be categorized into two types:
 - 1) adopting technical criteria developed by ANSI accredited standards development organizations.
 - 2) establishing and maintaining database(s) of equipment approved as compliant with the technical criteria.
- As mandated by the FCC, the ACTA performs its responsibilities in an equitable and nondiscriminatory manner.

Summary of ACTA Responsibilities

- Adopt technical criteria submitted from ANSI-accredited Standards Development Organizations (SDOs) or committees.
- Provide 30-day public notice to inform industry of proposed technical criteria.
- Operate and maintain an accurate database of compliant equipment.
- Establish and maintain an appropriate labeling methodology.
- Respond to inquiries from the public regarding its technical criteria.

Summary of ACTA Responsibilities (continued)

- Manage such other tasks as necessary and within the Council's scope that were formerly part of the FCC's Part 68 functions.
- Ensure that the management, activities, and decisions of the Council are independent from all external influences.
- Coordinate, if necessary, which industry SDOs will take on a particular development project.

Full detail regarding the ACTA's responsibilities are outlined in the ACTA's Operating Procedures and Principles, available at <https://www.part68.org/documents/>.

Adopting Technical Criteria

- Any ANSI-accredited SDO observing ANSI consensus decision-making procedures may establish technical criteria and submit such criteria to the ACTA for adoption.
- The ACTA then publishes the submitted criteria as [Proposed Technical Criteria](#) for terminal equipment, providing a 30-day public notice for industry review.
- After 30 days, the ACTA will publish the Technical Criteria as [ACTA Adopted Technical Criteria](#).
- On publication, the Commission considers the technical criteria to be **presumptively** valid, i.e., enforceable under federal law.
- **The ACTA will not make substantive decisions regarding the development of technical criteria nor does the ACTA recommend products or technologies.**

Technical Criteria Submission Procedures

- As provided for in 47 C.F.R. § 68.604, any ANSI-accredited SDO, observing ANSI consensus decision-making procedures, may establish technical criteria and submit such criteria to the ACTA. When submitting technical criteria, the SDO must certify, in writing, that:
 - The submitting SDO is an ANSI-accredited SDO.
 - The technical criteria that it proposes for adoption does not conflict with any current ACTA adopted technical criteria or with any technical criteria submitted and pending for adoption.
 - The technical criteria that it proposes for adoption are limited to preventing harms to the public switched telephone network, identified in § 68.3 of Part 68.
 - The technical criteria were developed in accordance with ANSI requirements for consensus and due process.

Submission Procedures (continued)

- Submissions should be sent to the ACTA at acta@atis.org and be provided in PDF format.
- Additional details for submitting Technical Criteria can be found in Annex A and B of the ACTA Operating Principles and Procedures.

Appealing Technical Criteria

- Individuals and entities possessing directly and materially affected interests and believing that they have been or will be adversely affected by the actions or inaction of the ACTA shall have the right to appeal such action or inaction.
- Appeals relating to the activities of a SDO submitting technical criteria to the ACTA, must utilize the appeals processes afforded by that SDO, the ANSI if applicable, or alternatively, the FCC.
- In the case of action or inaction appropriate for the ACTA appeals process, individuals and entities are encouraged to first approach the ACTA leadership with an informal complaint before pursuing the official appeals process.

Establishing and Maintaining a Database

- The ACTA maintains a database of terminal equipment and HAC-compliant ACS telephonic CPE approved as compliant to FCC Part 68 and ACTA-adopted technical criteria.
- The Part68 database can be accessed at <https://part68.org>. No account is required to search the database. However, an account is required to submit filings.
- The Part68 database currently contains over 45,000 entries (as of this presentation's date).

Approval Methods

- Terminal equipment, certain private-line services requiring such approval, and HAC-compliant ACS telephonic CPE must comply with the applicable Part 68 rules and regulations and with the applicable ACTA-adopted technical criteria, labeling requirements, and customer information requirements. Two approval methods are recognized:
 - Telecommunications Certification Body (TCB): follows FCC guidelines for TCB program
 - Supplier's Declaration of Conformity (SDoC): follows guidelines for SDoC method
- Pursuant to §68.610(b), Responsible Parties, whether they obtain their approval from a TCB or utilize the SDoC process, shall submit to the ACTA Secretariat all information required by the ACTA.

Requirements to Use the SDoC Process

- Entities utilizing the SDoC process must provide:
 - The identification and a description of the Responsible Party for the SDoC and the product, including the model number of the product.
 - A statement that the terminal equipment conforms with applicable technical requirements, and a reference to the technical requirements.
 - The date and place of issue of the declaration.
 - The signature, name and function of person making declaration.
 - A statement that the handset, if any, complies with §68.316 defining hearing aid compatibility, or that it does not comply with that section.
 - Any other information required to be included in the SDoC by the ACTA.

SDoC Requirements (continued)

- Responsible Parties for a SDoC shall maintain records containing:
 - A copy of the Supplier's Declaration of Conformity
 - The identity of the testing facility, including the name, address, phone number and other contact information
 - A detailed explanation of the testing procedure utilized to determine whether terminal equipment conforms to the appropriate technical criteria
 - A copy of the test results for terminal equipment compliance with the appropriate technical criteria
- Further details regarding the SDoC requirements can be found in the ACTA Submission Guidelines.

ACTA Online Filing System

- The continuation of a uniform, nationwide database is essential to protecting public interests.
- ACTA maintains an accurate database that is readily available and accessible to the public including persons with disabilities.
- In May 2021, the ACTA updated its website and the ACTA Online Filing (AOF) system. With this update:
 - All filing types can be completed online, eliminating the need to mail or email “paper” forms.
 - The AOF is user friendly and has a user guide.
 - FAQs have been updated and additional information regarding the ACTA has been added to the website.

Filing Types on the AOF

- All filing types are accommodated by the AOF. For descriptions and fees associated with each filing type, please visit: <https://www.part68.org/online-filing/filing-types-and-fees/>
 - Register an RPC
 - Original Filing
 - Modification Filing
 - Notice of Change Filing
 - Recertification Filing
 - Transfer RPC
 - Validate RPC Data (including Stabilized Maintenance)

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ACTA Membership

- Membership in the ACTA is open to any organization, company or group having an interest in the business of the ACTA.

Historical Membership

- The original ACTA was comprised of two members (plus one alternate) from six industry segments, and a non-voting Chair: Local Exchange Carriers (“LEC”), Interexchange Carriers (“IXC”), Terminal Equipment Manufacturers (“TEM”), Network Equipment Manufacturers (“NEM”), Testing Laboratories (“LAB”), Other Interested Parties (“OIP”).
- In December 2007, ACTA modified its Operating Principals and Procedures to reduce the number of interest segments from six to four:
 - Service Provider Segment (“SPS”)
 - Manufacturer Segment (“MS”)
 - Testing Laboratories Segment (“LAB”)
 - Other Interested Parties (“OIP”)

Membership Today

- Membership in the ACTA is open to any organization, company or group having an interest in the business of the ACTA.
- There are no quorum requirements for meetings or voting.
 - Companies shall register with the ACTA by submitting written correspondence declaring an Interest Segment, identifying a “Company/Organization Voting Participant” and providing contact information for the Company/Organization Voting Participant.
 - Each Member shall identify a Company/Organization Voting Participant as that company/organization’s primary contact for ACTA-related business. Company/Organization Voting Participants shall vote on behalf of their company. Each Member company can appoint an Alternate, in the case that the primary Voting Participant is unable to vote.
- To download an ACTA membership form, please visit <https://part68.org/about/>

Summary

- The rules in Part 68 and the ACTA adopted criteria have a distinct purpose to prevent harm to the telephone network.
- Also, they provide a “level playing field” to manufacturers and sellers of telephone equipment intended to be connected to the network.
- Part 68 was expanded in 2017 to include ACS telephone CPE.
- The ACTA continues to update its systems and processes to meet the needs of the industry.



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Questions?

More information regarding the ACTA can be found at <https://part68.org>

Please reach out to acta@atis.org with any questions.