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August 27, 2025

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Advanced Methods to Target and Eliminate Unlawful Robocalls – CG Docket 17-59
Call Authentication Trust Anchor – WC Docket 17-97
Targeting and Eliminating Unlawful Text Messages – CG Docket 21-402
Numbering Policies for Modern Communications – WC Docket 13-97
Telephone Number Requirements for IP-Enabled Service Providers – WC Docket 07-243
Implementation of TRACED Act Section 6(a) – knowledge of Customers by Entities with Access to Numbering Resources – WC Docket 20-67
Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership – IB Docket 16-155

Dear Ms. Dortch:

On August 25, 2025, the Voice on the Net Coalition (VON)¹ represented by Paula Boyd, Microsoft; Darah Franklin, Google; Dmytro Kulyk, Nextiva; Jennifer Best Vickers, Paul Kenefick and Erin Emmott, Twilio; Olive Morris and Harold Lee, Telnyx; Marie Chambarlhac, Dialpad; Brendan Kasper, 8X8, and the undersigned met with Commissioner Olivia Trusty and her senior legal advisor Marcus Maher and discussed, among other issues, VON's filings in the above-referenced proceedings.

Both in comments filed in the FCC's robocall dockets and as a member of the STI-GA Board of Directors, VON has been supportive of Commission and industry efforts to broadly adopt STIR/SHAKEN and reduce illegal traffic. VON described four issues that remain unresolved.

First, VON is concerned about the lack of clarity around the Know Your Customer (KYC) obligations and the potential for significant fines for violations of what is obviously

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of internet communications. See www.von.org.

a vague standard. Specific KYC obligations cannot be defined through enforcement actions. In a recent NAL, the Commission cited the Lingo consent decree² as a basis for imposing liability. This is in direct contravention of notice and comment requirements. Instead, VON recommended that the FCC make clear that forfeitures may only be imposed when a voice service provider has actual knowledge of the illegal traffic and has failed to mitigate that traffic. Without this clarification, providers acting in good faith could be subject to substantial fines.

Second, while VON is somewhat encouraged by the NPRM regarding call authentication for non-IP networks,³ it remains concerned about the large number of calls that are signed by originating carriers but unsigned at termination as they make their way through a call chain that includes non-IP networks. VON questions whether any solution that allows providers to delay transitions to all-IP networks will delay efforts to mitigate illegal traffic and also impair the nationwide transition to NG911 and encourage a system of unnecessary charges in the ecosystem. Therefore, VON recommended that the FCC require voice service providers to upgrade their networks to all-IP by a date certain and to encourage all local exchange carriers to negotiate reasonable IP interconnection terms and conditions.⁴

Third, VON has lingering concerns about wrongful blocking and mislabeling of lawful traffic. VON did not support the adoption of 603+ as the required SIP Code for notification to calling parties that a call has been blocked based on analytics. VON recommended the continuing use and development of SIP Code 608 – which we believe should have been permitted along with 603+. That said, VON members are working with industry to develop solutions and redress options to make sure callers can be reached and encouraged the Commission not to extend the deadline to implement 603+. VON is hopeful these efforts will be fruitful but may come back to the Commission if those responsible for the blocking and mislabeling of lawful and wanted calls only propose solutions that unnecessarily increase the costs of providing services.

Finally, VON recommended that the Commission not adopt proposed restrictions on interconnected VoIP providers direct access to telephone numbers as the proposed rules would have an anticompetitive impact and would not reduce the number of illegal robocalls. Any new obligations should apply equally across the industry, regardless of technology. VON noted that while the common narrative suggests that interconnected VoIP providers are primarily responsible for robocall traffic, publicly available data from the Industry Traceback Group suggests that traditional service providers, including wireless providers, are far more likely to have tracebacks than interconnected VoIP providers, including VON members.

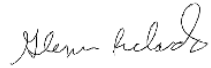
² Lingo Telecom, LLC Order, File No.: EB-TCD-24-00036425, Consent Decree, Attachment 1, Operating Procedures (rel. August 21, 2024).

³ Notice of Proposed Rulemaking, WC Docket 17-97 (rel. April 29, 2025).

⁴ Reply Comments of the Voice on the Net Coalition, WC Docket No. 17-97 (filed August 15, 2025).

Please contact the undersigned if you have any questions.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Glenn S. Richards".

Glenn S. Richards

Lee Petro

Counsel to the Voice on the Net Coalition

Cc: Commissioner Olivia Trusty (by email)
Marcus Maher (by email)