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December 11, 2025

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

Re**:** *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.

Dear Ms. Dortch:

The Voice on the Net Coalition (VON)[1] respectfully submits two recommendations in response to the draft Third Report and Order and Further Notice of Proposed Rulemaking in the above-captioned dockets, released November 25, 2025, under FCC-CIRC2512-01 ("the "Draft"). The Draft is scheduled to be considered at the Commission's December 18, 2025, Open Meeting. As described below, VON recommends the Commission eliminate or significantly modify the scope of any certifications by existing VoIP numbering authorization holders related to investigations and for the Commission to issue a Public Notice providing specific guidance on the finalized certification requirements.

I. The Commission Should Eliminate or Substantially Modify the Investigations Certification Requirement.

VON recommends that for existing VoIP numbering authorization holders who obtained direct access number authorization prior to August 8, 2024, the Commission should eliminate the certification requirement related to regulatory agency investigations as proposed in Section 52.15(g)(3)[2] because it is redundant, overbroad, and vague.

[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.
[2] Draft at para. 13. The certification requires that "neither the authorization holder nor any of its key personnel identified in the application are or have been subject to a Commission, law enforcement, or any regulatory agency investigation for failure to comply with any law, rule, or order, including the Commission's rules applicable to unlawful robocalls or unlawful spoofing."

First, existing number authorization holders have established a multi-year record of compliance with applicable rules. Any evidence of noncompliance related to unlawful robocalls or spoofing is already available to the Commission. An additional certification requirement for these holders would be redundant. Absent this certification requirement, the Commission still has ample authority to use any evidence of noncompliance to request further information, initiate a formal investigation, or suspend an entity's authorization for rule violations if warranted.

Second, the scope of this requirement is overly broad in both whom it applies to, and the information required by the certification. Key personnel identified in the application may include individuals who were not employed by the applicant or involved in the relevant regulatory investigation at the time of the event. Moreover, the certification could be interpreted to apply to investigations by the Commission, law enforcement, or any regulatory agency related to "**any law, rule, or order**" (**emphasis added**), regardless of whether the investigation is pending, inconclusive, or even related to unlawful robocalls or spoofing. This broad approach is inconsistent with the stated rationale, which suggests the updated certifications are needed "to ensure that all authorization holders are equally compliant with our requirements and fully aware of important robocall-related obligations enacted since they first obtained their VoIP numbering authorizations."[3]

Third, the certification does not specify a timeframe. As drafted, it could apply to investigations that occurred before the entity obtained its VoIP number authorization, before applicable enforcement limitation periods, or even before the entity began operations as a VoIP authorization holder. This lack of a defined time period will create confusion and result in the disclosure of irrelevant regulatory matters to the Commission.

Alternatively, if the Commission chooses to maintain the certification related to investigations, it should narrow the scope of required disclosures and revise the certification to read as follows:

The filing entity has not, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency enforcement action resulting in a final, non-appealable adjudication of wrongdoing (including a forfeiture that has been paid or a final court order) that the filing entity transmitted, assisted, or otherwise facilitated illegal robocalls or spoofing, or filed a deficient Robocall Mitigation Database certification or mitigation program description.

This change will exclude pending or inconclusive matters,[4] as well as investigations unrelated to robocalling or spoofing that are not relevant to the Commission's concerns. It will

[3] Draft at para. 14.

[4] VON also supports the comments filed by Telnyx, LLC requesting that the Commission eliminate the investigation certification, and noting that an investigation a) is not a final Commission decision or a finding of misconduct, b) may easily be weaponized by competitors, disgruntled customers and regulators and c) will chill self-reporting. See, Comments of Telnyx,

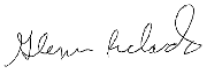
also help avoid unnecessary delays and follow-up by Commission staff and will align with the two-year disclosure period required for filings in the Robocall Mitigation Database.[5]

II. The Commission Should Provide Administrative Guidance for Existing VoIP Number Authorization Holders.

In addition, once the Report and Order is effective and a filing deadline established, VON recommends that the Commission issue a Public Notice with detailed certification filing requirements for holders of authorizations issued before August 8, 2024. This Public Notice should include a filing template listing the specific certifications required to maintain direct access privileges. Providing a detailed Public Notice will give clear guidance for these entities, promote consistent filings for Commission staff to review, and reduce the risk of administrative errors leading to incomplete certifications.

Please contact the undersigned if you have any questions.

Respectfully submitted,



Glenn S. Richards
Counsel to the Voice on the Net Coalition

WC Docket No. 13-97, filed December 3, 2025. Accordingly, the Commission should not classify Telnyx as a bad actor based on an unresolved Notice of Apparent Liability.

[5] See, 47 CFR 64.6305(d)(2)(iv).