

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	
Telephone Number Requirements IP-Enabled Service Providers)	WC Docket No. 07-243
)	
Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access Numbering Resources)	WC Docket No. 20-67
)	

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net (“VON”) Coalition¹ hereby submits these comments in response to the Third Further Notice of Proposed Rulemaking (the “FNPRM”)² in the above-referenced dockets. VON supports effective, evidence-based measures to combat illegal robocalling and to safeguard numbering resources. The FNPRM’s contemplated restrictions on interconnected VoIP providers’ numbering authorizations and potential reclamation of numbers raise significant policy, operational, and consumer-protection concerns. As the Commission already has the necessary tools to address misconduct of providers with direct access to numbers, the FNPRM introduces unsupported premises and relies upon criteria so broad for one provider type as to invite arbitrary outcomes, risks reducing transparency, increasing costs, and

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 *Third Report and Order and Third Further Notice of Proposed Rulemaking*, WC Docket No. 13-97, WC Docket No. 07-243, WC Docket No. 20-67 (rel. December 19, 2025); see also, 91 Fed. Reg. 6608 (February 12, 2026)(establishing a comment date of March 16, 2026).

destabilizing operations for interconnected VoIP providers without a demonstrated benefit to consumers.

Restricting VoIP Provider Access to Telephone Numbers Will Not Stop Illegal Robocalls

The FNPRM assumes that interconnected VoIP providers' direct access to numbering resources is a meaningful driver of illegal robocalling, but available data, including Industry Traceback Group reports and SIMbox fraud trends, do not support the premise that interconnected VoIP providers are the primary originators of fraudulent traffic. Indeed, fraud risk is more closely tied to know-your-customer (KYC) practices, traffic monitoring, STIR/SHAKEN implementation, traceback responsiveness, and internal enforcement protocols. Restricting direct access to telephone numbers by interconnected VoIP providers does not alter the technical capacity to originate traffic but would merely shift numbering relationships upstream rather than eliminate bad actors' ability to obtain numbers.

Forcing VoIP providers into wholesale numbering partner arrangements increases reliance on "Intermediate" classifications in FCC Form 502.³ Wholesale reporting of "intermediate numbers", in contrast to direct access providers, has historically been inconsistent which can produce misclassification, double-reporting, and inaccurate utilization data. Multi-layered intermediation with inconsistent reporting in FCC Form 502 obscures, rather than illuminates, traffic sources and utilization.

In addition, wholesale number acquisition is not cost-neutral; activation charges, monthly recurring charges, port-out fees, tiered non-transparent pricing, and inventory scale

³ FCC Form 502 is the Numbering Resource Utilization/Forecast Report, a biannual report filed with the North American Numbering Plan administrator to numbering authorization holders allowing industry to track how telephone numbers are used and forecasts future needs to ensure efficient resource management.

effects would increase operational costs, which would be passed through to small businesses, enterprises, and consumers, and there is no record evidence that such costs would reduce illegal robocalls by providing better data. A cost-raising, benefit-uncertain approach, with uncertain data outcomes, conflicts with the Commission's consumer-protection goals.

There is no benefit to restricting new VoIP numbering authorizations or reevaluating existing authorizations for entities that may be using equipment on the FCC "Covered List."⁴ Any national-security screening should (a) be evidence-driven; (b) apply an individualized, procedurally robust review; (c) avoid per se disqualifications untethered to demonstrated risk; and (d) provide remediation pathways and transition periods to protect end users and continuity of service.

As the Commission already has the necessary tools to police misconduct, including the authority to revoke numbering authorizations, including where an authorization holder fails to comply with numbering rules, no longer meets eligibility, has made a false statement, or where revocation is deemed in the public interest.⁵ Further, the newly adopted framework in the Third Report and Order accompanying the FNPRM applies updated certifications and ownership disclosures to existing authorization holders and allows suspension, termination, or revocation upon noncompliance or public-interest concerns. These tools, properly and consistently applied, negate any need for categorical restrictions based on provider type.⁶

While the Commission may determine that reclamation is warranted in rare cases

⁴ FNPRM at para. 30.

⁵ See, 47 C.F.R. § 52.15(g)(3)(ix).

⁶ Another reason to pause acting in this proceeding is that that Commission appears poised to release a new rulemaking that similarly addresses numbering use, and those comments may be relevant for consideration in this docket. See, *Notice of Proposed Rulemaking*, WC Docket No. 26-49, WC Docket No. 13-97, WC Docket No. 07-243, WC Docket No. 20-67, FCC-CIRC 2603-02 (rel. March 5, 2026).

involving demonstrable and intentional facilitation of unlawful conduct, the proposed reclamation of assigned telephone numbers following revocation or termination of a VoIP numbering authorization would, in most circumstances, risk substantial disruption to customers and the broader communications ecosystem.⁷ Following reclamation, providers and consumers would face mass porting, large-scale NPAC reassociation, LRN routing updates, BIIRDS synchronization, and thousands-block contamination challenges, creating significant risks of service interruption, misrouted calls, emergency routing failures, enterprise disruption, and distortions in exhaust forecasting. Any reclamation policy must prioritize continuity of service and public safety, and should be a last resort following targeted enforcement.

CONCLUSION

For the reasons discussed herein, the Commission should reject categorical restrictions on interconnected VoIP providers' direct access to numbering resources; and rely on targeted, conduct-based enforcement using existing suspension, termination, and revocation tools.

Respectfully submitted,

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⁷ FNPRM at para. 29.