

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

In the Matter of

Combatting Illegal Robocalls Through)	WC Docket No. 26-49
)	
Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	
Telephone Number Requirements IP-Enabled)	WC Docket No. 07-243
Service Providers)	
)	
Implementation of TRACED Act Section 6(a) –)	WC Docket No. 20-67
Knowledge of Customers by Entities with Access)	
Numbering Resources)	

COMMENTS OF THE VOICE ON THE NET COALITION

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TABLE OF CONTENTS

COMMENTS OF THE VOICE ON THE NET COALITION 1

A. A LIMITATION ON NUMBER RESALE WOULD IMPEDE COMPETITION AND INNOVATION IN THE VOICE MARKETPLACE WITHOUT EVIDENCE THAT IT WOULD LIMIT FRAUD 2

 1. Wholesale-Only Arrangements..... 3

 2. Bundled Wholesale 3

 3. The Commission Should Not Prohibit Sub-Resale 4

B. VON SUPPORTS THE COMMISSION’S GOAL FOR MORE VISIBILITY AND ACCOUNTABILITY IN THE NUMBER RESALE MARKET 7

C. STATES ROLE IN NUMBERING 9

D. PROHIBITING NUMBER CYCLING WILL HARM LEGITIMATE USERS AND NOT LIMIT FRAUD 10

CONCLUSION 12

SUMMARY

The VON Coalition supports FCC efforts to combat illegal robocalls but urges targeted, technology-neutral rules that avoid harming the competitive resale ecosystem. VON opposes limiting number resale to a single level, explaining that wholesale-only and bundled-wholesale models lawfully enable smaller providers to compete, foster innovation, and serve consumers and enterprises. Sub-resale restrictions in other countries have stifled innovation, favored incumbents, increased costs, and failed to curb fraud, and that the proposed restrictions would also harm non-voice uses like messaging and Internet of Things (“IoT”). The Commission should focus its resources on evidence-based enforcement against bad actors instead of structural limits.

VON supports greater visibility and accountability in the number resale market but finds expanded NRUF reporting impractical and burdensome, proposing instead that resellers maintain lists of downstream resellers with annual certification, and extending robocall-related certifications to all numbering holders and resellers across technologies. It supports allowing state commissions broader confidential access to multi-state data tied to investigations, but opposes state authority to deny numbering resources or effectively revoke VoIP numbering access, citing the FCC’s exclusive jurisdiction. Finally, VON urges against prohibiting number cycling, noting legitimate rotation use to counter erroneous analytics labeling, and recommends targeted KYC obligations for providers enabling cycling to deter bad actors without harming lawful users.

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COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net (“VON”) Coalition¹ hereby submits these comments in response to the Notice of Proposed Rulemaking (the “NPRM”) in the above-referenced dockets.² VON supports the Commission's goal of eradicating illegal robocalling and shares its concern that numbering resources must not be weaponized by bad actors. But VON urges the Commission to adopt targeted, workable rules that are proportionate to actual risk, technology-neutral, and do not inadvertently harm a competitive wholesale marketplace that benefits millions of American consumers and businesses. Specifically, as explained below, VON has serious concerns that limiting the resale of telephone numbers would impair competition and stunt a highly competitive resale market.

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 *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-26-17 (rel. March 27, 2026); see also 91 Fed. Reg. 25312 (May 8, 2026) (establishing a comment deadline of June 8, 2026).

BACKGROUND

In the NPRM the Commission seeks comment on proposals that would a) require one-time robocall-related certification requirements from resellers of telephone numbers within 30 days of the effective date of the new rule;³ b) modify the existing numbering utilization report (FCC Form 502) to better support detection, mitigation and enforcement efforts against illegal robocalls;⁴ c) prohibit the resale of telephone numbers beyond a single level, such that resellers of telephone numbers could only provide retail service to their own end users and may not provide wholesale services;⁵ d) address number cycling (the use of a large quantity of telephone numbers on a rotating basis) when used to evade provider and third-party analytics that might otherwise block similar calls that come from a single telephone number;⁶ and e) expand the numbering data available to state regulatory commission to better identify fraudulent use and misuse of telephone numbers.⁷ Finally, the Commission seeks comments on the costs and benefits associated with adopting these proposals.⁸

DISCUSSION

A. A Limitation on Number Resale Would Impede Competition and Innovation in the Voice Marketplace Without Evidence that it Would Limit Fraud

The existing system that allows for direct access and resale of phone numbers has given rise to a highly competitive communications ecosystem that has resulted in new, innovative

³ NPRM at paras. 16-17. The Commission proposes to define resellers of telephone numbers as all LECs, CMRS providers, and interconnected VoIP providers reselling or seeking to resell services that include the provisioning of geographic numbering resources other than pseudo-ANI.

⁴ NPRM at paras. 33-40.

⁵ NPRM at para. 48.

⁶ NPRM at para. 41. The Commission notes that number cycling is also used by callers based on the perception that anti-robocalling analytics are accidentally labeling and blocking legitimate calls. NPRM at 54.

⁷ NPRM at paras. 59-60.

⁸ NPRM at paras. 69-73.

products and services that benefit consumers. As described below, the resale market can take various forms and each is a valid use case. Thousands of service providers are offering products associated with phone numbers – whether voice, data, Internet of Things (“IoT”), or messaging applications. New regulations that would restrict the resale of telephone numbers to a single level would only serve to stunt this growth and innovation.

1. Wholesale-Only Arrangements

In wholesale-only arrangements, a service provider holds or obtains numbering resources directly from the North American Numbering Plan Administrator (“NANPA”) or purchases numbers on the resale market. That service provider furnishes those numbers, together with origination and termination services, and nothing more, to downstream service providers (“resellers”). The wholesale service provider has no direct relationship with end users. It neither bills end users nor manages their accounts.

Resellers take the numbers provided from the wholesale service provider, combine them with the reseller’s own equipment, platforms, and services, to deliver a finished product to end users. This model underpins a significant portion of the competitive VoIP marketplace. It allows smaller providers to offer service without building national infrastructure. It promotes innovation and consumer choice, and it is expressly contemplated by the Commission’s own rules, which recognize “intermediate numbers” as a lawful and expected category in NRUF reporting.⁹

2. Bundled Wholesale

In a bundled-wholesale arrangement, a provider assembles a complete service package— numbering resources, voice origination and termination, and additional communications features (e.g., UCaaS, capabilities such as auto-attendant, call routing, voicemail, conferencing, messaging,

⁹ NPRM at paras. 26-27.

and CRM integrations). The entire bundled service is sold to resellers—typically agents, value-added resellers (VARs), managed service providers, or system integrators—who market and support the end-user relationship. This model is particularly prevalent in the enterprise and small-business segments, where demand for productivity solutions with integrated communications is high and resellers add substantial value through customization and local support.

Both the wholesale-only and bundled-wholesale models serve legitimate commercial purposes and are widely used throughout the voice communications ecosystem, including by traditional telecommunications carriers offering similar wholesale services. These models allow for a vibrant resale market that serves consumer and enterprise customers with a wide variety of pricing, service and billing options, and is directly responsible for the rapid growth of VoIP in the voice ecosystem and availability of cloud enabled productivity solutions which are critical to the US economy and modern workforce.

3. The Commission Should Not Prohibit Sub-Resale

The fundamental problem is not that numbers are resold at multiple levels. It is that some entities in the resale chain are selling numbers to entities engaged in illegal robocalling. Targeted, evidence-based enforcement against those specific entities is the most effective and least market-distorting approach.

Several European countries, including France, have experimented with restrictions on the sub-resale or transfer of numbering resources. The results have been consistently negative, including the additional burden on the regulator to oversee and enforce new obligations. We urge the Commission to consider this evidence carefully before taking a similar path.

Limited innovation, no benefit. Restricting sub-resale has stifled the development of specialized wholesale and aggregation services that depend on the ability to source and redistribute numbering resources across multiple tiers of the supply chain. The European experience demonstrates that limiting sub-resale primarily benefits large incumbents that already hold numbering resources directly and disadvantages smaller and newer market entrants. Perhaps most importantly, single-level resale restrictions have not materially reduced the volume of illegal robocalls or fraudulent calling in the jurisdictions that have adopted them. Bad actors have simply adapted their operations to source numbers through compliant-appearing front entities or by using numbers obtained through other means, including spoofing.

Sub-resale restrictions will also limit competition and increase prices. There are only a relatively small number of voice service providers that have direct access to telephone numbers. It would put enormous pressures on those entities if they were now required to enter into thousands of new commercial agreements with smaller voice providers who today may be receiving numbers from resellers. The radical change in the market and reduction in suppliers would also likely result in higher prices from a decreasingly less competitive marketplace for telephone numbers. Furthermore, it would require unwinding or abrogation of existing commercial agreements for telephone numbers which would impose significant transaction costs on VSPs with no corresponding consumer benefit.

In addition, restrictions on number resale would impact the non-voice market that is outside the scope of illegal robocalling. Telephone numbers are used for far more than voice services. This includes text, both SMS and MMS; and other services that use telephone numbers as identifiers to provide non-voice services, including Rich Communications Services, WhatsApp,

Internet of Things and other over-the-top applications.¹⁰ None of these are classified as telecommunications services or interconnected VoIP by the Commission, and impeding the availability of these critical services (or those services yet to be developed) will not decrease the number of illegal robocalls.

Finally, Congress in the Telecommunications Act of 1996 recognized the importance of a vibrant resale market. In particular, Section 251(c)(4) imposes an obligation on incumbent local exchange carriers to offer for resale at wholesale rates, any telecommunications service that the carrier provides at retail to its subscribers, and prohibiting or imposing unreasonable or discriminatory conditions on such resale.¹¹ Any action by the Commission to limit resale of telephone numbers should be highly scrutinized, substantially supported by evidence that it will result in mitigation of illegal robocalls, and not outweighed by the harm to competition and consumers. Moreover, the Commission already possesses substantial authority to initiate enforcement proceeding against entities identified through reporting and tracebacks as facilitating illegal robocalls; a more-focused response rather than imposing across-the-board structural limitations on the entire market.

¹⁰ VON notes that while sub-assignment restrictions have been adopted in certain European countries, in those countries you can utilize alphanumeric SenderIDs for messaging termination at low or no extra costs. In contrast, the US has very expensive and somewhat limited alternatives (e.g., short codes) if telephone numbers are not readily available.

¹¹ 47 U.S. Code § 251(c)(4). Moreover, Section 201 of the Communications Act, mandating that carriers provide service upon reasonable request, and Section 202, prohibiting unlawful discrimination, have been interpreted as providing the FCC authority to deem unreasonable restrictions on resale unlawful. See, e.g., *Resale and Shared Use of Common Carriers Services and Facilities*, 60 FCC 2d 261 (1976), modified on other grounds (*Resale and Shared Use Reconsideration Order*), 62 FCC 2d 588 (1977), *affd sub nom. AT&T v. FCC*, 572 F.2d 17 (2d Cir. 1978), cert. denied, 439 U.S. 875 (1978) (holding that tariff provisions restricting resale violated Sections 201(b) and 202(a) of the Communication Act).

B. VON Supports the Commission’s Goal for More Visibility and Accountability in the Number Resale Market

VON supports the Commission’s proposal to create more visibility and more accountability in the number resale market but respectfully suggests that expanding NRUF reporting is not the best alternative as it would be excessively burdensome and disproportionate to its likely benefits. Wholesale providers reselling numbers to dozens or hundreds of resellers cannot realistically obtain, verify, and reconcile usage data from each of those resellers on a semi-annual reporting cycle. The Commission itself acknowledges the difficulty of collecting such data.¹² Requiring every reseller to independently file NRUF reports would extend reporting obligations to hundreds of additional entities—many of them small businesses—that lack the systems, expertise, or resources to comply accurately. The risk of increased errors and non-compliance would be high. In addition, numbers are not generally sold as large blocks, so reporting at the individual number level would be difficult and impracticable. Modern VoIP platforms are not static and often assign numbers dynamically and on-demand, making that level of reporting impractical.

Instead, VON recommends that the Commission require all resellers of telephone numbers to maintain a list of the resellers to whom they provide telephone numbers. That list would be available upon request from the Commission, and the Commission could require an annual record keeping compliance certification. This structure provides the Commission meaningful visibility into the number resale market with limited light touch information collection.

VON asserts that this record keeping approach would avoid the anti-competitive concerns of the NPRM’s proposal that providers of record should bear the burden of obtaining information

¹² NPRM at. para. 34.

about their resellers' downstream customers, including sub-resale relationships.¹³ Requiring providers of record to collect and report data on their resellers' resellers (i.e., entities with whom the provider of record has no direct contractual relationship) is operationally impractical. Imposing this obligation would require wholesalers to audit their entire downstream supply chain—a mandate with no parallel in any other area of telecommunications regulation.

The requirement would also be anti-competitive. It would give wholesale providers visibility into commercial relationships between other carriers to which they should not be privy. It could also consolidate the market to give a few wholesale providers the ability to dictate resale relationships and rates. This would harm innovation and increase consumer costs.

Finally, VON supports establishing accountability in the numbering market by extending robocall-related certification obligations to all entities that directly receive numbering resources from NANPA and to resellers of telephone numbers.¹⁴ Adoption of the rule will further bolster Commission oversight of the number resale market and ensure technical neutrality across providers. Adopting rules that impose certification obligations only on VoIP providers while leaving wireline carriers and wireless carriers unbound creates an unjustified regulatory disparity and does not address the full scope of potential abuse.

The Commission's existing robocall rules—STIR/SHAKEN, Robocall Mitigation Database, call blocking—already apply broadly to all voice service providers. Certification obligations should follow the same logic. Any provider—regardless of technology—that holds, seeks, or resells numbering resources should be subject to the same baseline anti-robocall certifications.

¹³ NPRM at para. 34.

¹⁴ NPRM at paras. 15–17.

C. States Role In Numbering

Modern telecommunications is inherently interstate. A robocalling campaign originating from numbers obtained in one area code may target consumers in multiple states. State commissions cannot effectively perform their investigative and enforcement functions if their data access is siloed by state boundaries. Thus, permitting state commissions to view NRUF data for providers operating in other states—subject to the existing confidentiality framework and to a demonstrated nexus to an ongoing investigation or numbering administration function—is a reasonable, targeted expansion of the existing framework.

The NPRM also asks whether state commissions should be empowered to direct NANPA to deny or withhold numbering resources from a provider.¹⁵ While VON does not object to state commissions playing an advisory role, it strongly opposes rules that would allow a state commission to block a provider’s access to numbering resources in State A because the provider has not exhausted numbers in State B. Telephone numbers are a federal resource administered under the Commission’s exclusive jurisdiction pursuant to Section 251(e)(1) of the Communications Act. The Commission has consistently and correctly held that it has “exclusive jurisdiction” over numbering administration. Any rule that allows a state to exercise a de facto veto over a provider’s nationwide numbering access would undermine that federal jurisdiction.

Moreover, number utilization rates and exhaust calculations are inherently geographic. A provider may have legitimate reasons for different utilization rates in different states, including market conditions, porting activity, and service mix. Penalizing a provider’s access to numbers in one state because of activity in an unrelated state is not a rational policy.

¹⁵ NPRM at paras 64–66.

Finally, only the FCC should have the authority to limit or revoke numbering access to VoIP direct numbering authorization recipients. The Commission granted VoIP providers the right to obtain numbering resources directly from NANPA in recognition of the Commission’s exclusive jurisdiction over VoIP numbering.¹⁶ Only the Commission can revoke this right. A rule allowing a state commission to effectively revoke a VoIP provider’s numbering access would be inconsistent with the Commission’s precedent and with the federal preemption principles governing VoIP service. To the extent a state commission believes a VoIP provider is misusing numbering resources or violating Commission rules, the appropriate remedy is to refer the matter to the Commission and its Enforcement Bureau for action, not for the state to independently deny access.

D. Prohibiting Number Cycling will Harm Legitimate Users and Not Limit Fraud

The Commission acknowledges that legitimate callers may engage in number rotation practices.¹⁷ VON urges the Commission to give substantial weight to these legitimate use cases before adopting any prohibition or restriction on number cycling.

Analytics-driven labeling and call blocking have created a significant operational challenge for legitimate callers. Enterprise businesses, contact centers, healthcare providers, debt collectors, political campaigns, and others with high outbound call volumes regularly find that their telephone numbers are incorrectly labeled as “scam likely” or blocked by carrier analytics, even when they are making entirely lawful calls. Number rotation is, for many of these entities, the only practical countermeasure.

¹⁶ See Report and Order, 30 FCC Rcd 6839 (2015).

¹⁷ NPRM at paras. 54–56.

This problem has been exacerbated by the growth of AI-driven and opaque call analytics tools that may apply overbroad labeling criteria. As the NANC has observed, “number rotation is an effective and warranted countermeasure” for legitimate callers whose numbers have been incorrectly tagged.¹⁸ The Commission should not conflate the use of number rotation by legitimate businesses with the misuse of number cycling by illegal robocallers. They are distinct practices by distinct actors, and the Commission’s rules should distinguish between them.

Enhanced know-your-customer (“KYC”) requirements would be more effective at stopping bad actors.¹⁹ Rather than prohibiting number cycling, the Commission should address the practice through KYC requirements targeted specifically at entities that provide number cycling services or that make large blocks of numbers available on a short-term or trial basis. KYC requirements for entities engaging in number cycling should include: (a) verification of the customer’s identity and business purpose; (b) confirmation that the customer has a legitimate, lawful use case for number rotation; (c) ongoing monitoring of call volumes, traceback activity, and analytics labeling of rotated numbers; and (d) contractual obligations requiring customers to cease cycling if their numbers are identified as sources of illegal traffic. These requirements would target the specific risk—number cycling by bad actors—without prohibiting the practice for legitimate users. They would also be self-enforcing to a significant degree, because providers that fail to perform adequate KYC would face liability for their customers’ violations.

¹⁸ NPRM ¶¶ 54.

¹⁹ The FCC is considering the adoption of KYC requirements in a recently initiated proceeding. See Further Notice of Proposed Rulemaking, CG Docket Nos. 17-59 and 02-278, FCC 26-27 (rel. May 1, 2026).

CONCLUSION

For the reasons discussed herein, the Commission should not restrict the resale of telephone numbers or prohibit number cycling. To gain better visibility into the telephone number resale market, the Commission should adopt enhanced reporting and certification requirements, and use the data generated by these reports to better understand the resale ecosystem and identify patterns of abuse.

Respectfully submitted,

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