

**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	)	

**REPLY COMMENTS OF THE VOICE ON THE NET COALITION**

The Voice on the Net (“VON”) Coalition<sup>1</sup> hereby submits these reply comments in response to the comments filed on the Notice of Proposed Rulemaking (the “NPRM”) in the above-referenced dockets.<sup>2</sup> In its initial comments, VON urged the Commission to adopt targeted rules that are proportionate to actual risk, technology-neutral, and do not inadvertently harm a competitive wholesale marketplace, and opposed restrictions on telephone number resale.

**DISCUSSION**

**I. The FCC should adopt VON’s suggestion of requiring providers to certify that they have a record of their resellers, and US Telecom’s proposal for number tracing**

In the NPRM, the Commission raised concerns about identifying resellers with secondary access to telephone numbers who may be facilitating illegal robocalls. To address this concern,

---

<sup>1</sup> 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](http://www.von.org).

<sup>2</sup> *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 reply comment deadline of July 7, 2026).

VON recommended that the Commission require all resellers of telephone numbers to maintain a list of the resellers to whom they provide telephone numbers.<sup>3</sup> That list would be available upon request from the Commission, and the Commission could require an annual record keeping compliance certification. VON suggested this structure would provide the Commission meaningful visibility into the number resale market with a light touch information collection.

VON also supports USTelecom’s recommendation that rather than imposing new obligation that will burden legitimate providers, the Commission should require any entity seeking access to numbers to participate in number tracing efforts.<sup>4</sup> Taken together, these proposals would enhance transparency and help stop bad actors. When number tracing confirms that a provider is regularly reselling numbers to bad actors, the Commission can obtain a record of the resale chain and take enforcement action against those not complying with Commission rules.

For this proposal to be workable, the Commission must adequately define reseller. There is confusion in the record over whether “reseller” means a wholesaler or anyone who sells a number-dependent service to another entity that has the direct relationship with the end customer. VON recommends defining reseller as any entity in the chain that does not have a direct relationship with the end customer.<sup>5</sup>

---

<sup>3</sup> VON Comments, WC Docket 26-49, at 7 (June 8, 2026).

<sup>4</sup> USTelecom Comments, WC Docket 26-49, at 8 (June 8, 2026).

<sup>5</sup> In contrast, NCTA suggests that the definition should be limited to entities that obtain numbering resources in bulk NCTA Comments, WC Docket 26-49, at 3 (June 8, 2026); whereas Inteliquent recommends that that the definition exclude the assignment or provisioning of numbering resources between entities under common ownership or control and exclude single-level provisioning, but preserving the definition’s reach over genuine third-party resale. Inteliquent Comments, WC Docket 26-49, at 21 (June 8, 2026).

**II. The FCC should require all providers who have direct access to numbers or resell numbers to sign the same certification.**

In its comments, VON supported extending robocall-related certification obligations to all entities that directly receive numbering resources from NANPA and to resellers of telephone numbers, noting that this will further bolster Commission oversight of the number resale market and ensure technical neutrality across service providers.<sup>6</sup> While local exchange carriers may be required to make individual state level certifications, those requirements will vary by state. There should be one standard certification that applies industrywide to entities that sell telephone numbers. Arguments that such certifications are unnecessary have been previously rejected in the context of VoIP provider direct access to telephone numbers, and should be rejected again.<sup>7</sup>

**CONCLUSION**

The Commission should act in accordance with the recommendations of the VON Coalition in its comments and these reply comments.

Respectfully submitted,

**VOICE ON THE NET COALITION**

/s/ Glenn S. Richards

Glenn S. Richards

Dickinson Wright PLLC

1825 Eye Street, NW, Suite 900

Washington, DC 20006

(202) 466-5954

[grichards@dickinson-wright.com](mailto:grichards@dickinson-wright.com)

Its attorney

July 7, 2026

---

<sup>6</sup> VON Comments at 8. See also, Comments of NCTA at 2; INCOMPAS Comments, WC Docket 26-49, at 5 (June 8, 2026) (both supporting the proposal that robocall certifications should apply to all providers receiving numbering resources from NANPA, not just VoIP providers.)

<sup>7</sup> See, e.g., Comments of Lumen at 2, WC Docket 26-29 (June 8, 2026); USTelecom Comments at 4.