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

In the Matter of

Advanced Methods to Target and Eliminate Unlawful Robocalls	))	CG Docket No. 17-59
	)	
Call Authentication Trust Anchor	))	WC Docket No. 17-97

COMMENTS OF THE VOICE ON THE NET COALITION

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SUMMARY

The Voice on the Net Coalition ("VON") supports the Commission's goal of deterring illegal robocalls and urges the Commission to use its existing enforcement authority to target the small cohort of bad actors responsible for the vast majority of unlawful traffic, rather than imposing sweeping mandates on the entire ecosystem. VON also recommends flexible, risk-based KYUP requirements anchored by a technology-neutral safe harbor; opposes one-time retroactive KYUP reviews of all upstream partners absent indicia of noncompliance; and urges limiting any KYUP and blocking obligations to directly upstream providers to avoid overreach, due-process concerns, and anticompetitive gatekeeping.

The Commission should not delegate enforcement to the STI-GA or other industry bodies; those core governmental functions must remain with the Commission. To promote consistency, the Commission should align definitions across related proceedings and avoid rigid constructs that would chill innovation. VON supports codifying STIR/SHAKEN attestation standards and allowing both initiating and originating providers to sign calls to improve authentication accountability and analytics outcomes. Any mandate to block unauthenticated traffic should await the completion of the IP transition to prevent wrongful suppression of lawful TDM-routed calls and must include clear, expedient redress mechanisms. The Commission should preempt conflicting state caller ID authentication requirements to establish a uniform national framework and reduce duplicative compliance burdens. VON urges adoption of an outcomes-focused safe harbor that facilitates good-faith information sharing and calibrated enforcement, and opposes the proposed $2,500 per-call KYUP base forfeiture as disproportionate. Finally, rather than issue orders in the eight concurrent proceedings targeting illegal robocalls, the Commission should consolidate overlapping proposals into an omnibus NPRM to ensure coherent definitions, realistic timelines, and administrable rules.

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The Voice on the Net ("VON") Coalition[1] hereby submits these comments in response to the Further Notice of Proposed Rulemaking (the "FNPRM") in the above-referenced dockets.[2] As explained below, VON supports the Federal Communications Commission's ("FCC" or "Commission") goal of deterring illegal robocalls, removing bad actors from the voice ecosystem, and restoring trust in legitimate voice traffic; goals best achieved through common-sense, proportional rules.

Currently, there are at least eight pending robocall-related proceedings,[3] many addressing overlapping definitions and interlocking rules directly impacting this FNPRM. Releasing standalone

[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. VON is also on the Board of Directors of the STIR/SHAKEN Governance Authority ("STI-GA").
[2] *Further Notice of Proposed Rulemaking,* CG Docket No. 17-59 and WC Docket No. 17-97 (rel. May 21, 2026); see also 91 Fed. Reg. 42602 (July 9, 2026) (establishing a comment deadline of August 10, 2026).
[3] In addition to this proceeding, there are proceedings regarding caller identity (Ninth Further Notice of Proposed Rulemaking, WC Docket 17-97, rel. Oct. 29, 2025); IP transition (Notice of Proposed Rulemaking, WC Docket 25-304, rel. October 29, 2025); numbering access restrictions (Notice of Proposed Rulemaking, WC Docket 26-49, rel. March 27, 2026); offshore call centers (Notice of Proposed Rulemaking, CG Docket 26-52, rel. March 27, 2026); know your customer requirements (Further Notice of Proposed Rulemaking, CG. Docket No. 17-59, rel. May 1, 2026); restrictions on dealings with foreign carriers (Notice of Proposed Rulemaking, WC Docket 26-82,

decisions will only create confusion, implementation complications and delay. As such, VON recommends that the Commission review the comments filed in this and the other open proceedings and issue a single, omnibus notice of proposed rulemaking to allow industry to weigh in on the full framework, leading to consistent rules and realistic timeframes.

I. BACKGROUND

VON supports the FNPRM's focus on stopping illegal robocalls and recommends that the Commission use its existing tools before adopting burdensome new requirements. The record in this proceeding shows that just 45 voice service providers ("VSPs") — 0.4% of the 10,872 VSPs with filings in the Robocall Mitigation Database ("RMD") — are responsible for 90 percent of illegal calls.[4] The Commission already has the tools it needs: its own investigatory and enforcement authority, working with other federal and state agencies and the Industry Traceback Group ("ITG"), it can investigate these 45 VSPs directly and, where a violation is proven, order their removal from the RMD, thereby making it unlawful for any other VSP to transmit their calls. This public process puts law enforcement, customers and other VSPs contracted with these providers on notice that removal from the RMD and termination of service may be forthcoming. It also gives those 45 VSPs the opportunity to investigate the purportedly illegal traffic, and either prove it is legal or explain their mitigation steps. Failure to do so will result in an order allowing other VSPs to block or cease carrying their traffic, and ultimately removal from the RMD.

Despite this small number of bad actors, and without relying on its existing tools, the Commission suggests stricter rules are needed industry-wide. It reasons that VSPs are ignoring

rel. May 1, 2026); and new robocall mitigation database filing requirements (Further Notice of Proposed Rulemaking, WC Docket No. 24-213, rel. July 23, 2026).

[4] FNPRM at Footnotes 44 and 50 ("90% of problematic calls come from 45 carriers" and there are 10,872 VSPs with filings in the RMD).

their existing "know your upstream provider" ("KYUP") obligations because pursuing revenue growth "deters them from instituting even the most basic practices to evaluate their upstream providers."[5] The record contains no evidence to support that assumption.

Nonetheless, VON agrees that evenly applied, common-sense rules requiring stronger authentication and rigorous upstream vetting could restore trust in legitimate voice traffic without undermining innovation. Therefore, VON recommends the Commission adopt KYUP rules with a safe harbor, avoid downstream-blocking rules that could invite competitive gamesmanship, and decline to delegate its enforcement and rulemaking responsibilities to industry members or standards bodies. These duties rest solely with the Commission and cannot lawfully be delegated to unregulated third parties.

II. DISCUSSION

While the VON Coalition commends the Commission's efforts at combatting fraud and scams at all points in the call path, the rules proposed here are overly prescriptive and inflexible, creating significant administrative burdens without addressing the root causes of illegal traffic. In the context of this FNPRM, a rigid one-size-fits-all approach strips VSPs of the flexibility necessary to tailor mitigation strategies to their unique networks and implement unique, innovative mitigation strategies to address new and evolving threats. Ultimately, these heavy-handed mandates will saddle legitimate businesses with costly compliance hurdles while doing little to stop the bad actors actually responsible for the fraud.

As explained below, VON supports flexible KYUP requirements paired with a baseline safe harbor, stronger authentication rules with flexibility as to which providers are allowed to sign calls, and pre-emption of state rules governing call authentication. VON recommends against

[5] Id. at para. 14.

delegation of the Commission's duties to third parties, letting voice providers decide which other providers may or may not send traffic over the public network, and adopting new definitions that could stifle innovation and invite gamesmanship. By granting providers the flexibility to tailor their compliance measures, the Commission can effectively protect consumers and target bad actors without encumbering legitimate network operators with unnecessary busywork.

A. New KYUP Requirements Should Be Proportional to the Problem and VSPs' Role in the Voice Ecosystem

As mentioned above, the Commission is proposing sweeping regulatory changes to the entire voice ecosystem in this proceeding and several other related proceedings to address problems caused by fewer than 50 bad actors. This is not a measured response to address the issue and will create overly burdensome compliance obligations on an industry that is working with the Commission to reduce fraud and abuse on the voice network. While VON does not believe new rules are necessary to address the Commission's concerns, it offers the following recommendations as a proportionate response.

First, VON supports a requirement to collect baseline information from new upstream providers, such as name, physical address, government-issued identification number, verifiable telephone number, website, and email address, together with confirmation of an RMD filing, while allowing flexibility to require additional information from existing upstream providers based on internal risk profiles. Higher risk upstream provider vetting could include, for example, verification of business registration information, legitimate commercial presence, and intended use of the service. VON agrees with the Commission's suggestion that, rather than mandating specific KYUP obligations, it adopts any new requirements as best practices eligible for a safe harbor from enforcement of general KYUP requirements.[6]

Second, VON opposes the Commission's proposal that within six month after the KYUP rules go into effect all VSPs perform a one-time KYUP review for direct upstream providers with which it has a service agreement if the VSP had not previously performed the new KYUP requirements.[7] This review should only be necessary for those upstream providers that may have demonstrated noncompliance with the Commission's robocall rules.

Third, VON also opposes the proposal that VSPs should be required to determine the eligibility of service providers to operate in the United States. The Commission, not industry, is responsible for verifying that providers are authorized to provide service in the United States. VSPs should be allowed to partner with any legitimate entity with a robocall mitigation database filing. If the Commission wants to limit which providers can file in the RMD, the Commission must adopt new limits through notice and comment rulemaking. That responsibility should not fall on the industry. Letting large industry players decide which companies may send or receive voice calls is inherently anti-competitive and risks concentrating market power in the hands of a few dominant providers.

Fourth, and for similar reasons, VON disagrees with the proposal that VSPs independently verify that a provider's RMD filing complies with FCC rules.[8] Requiring VSPs to step into the Commission's shoes and judge whether a filing complies with Commission rules is the wrong approach. Instead, the Commission should adopt its own proposal in the RMD Rulemaking that

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[6] Id. at para. 40.
[7] Id. at para. 16.
[8] Id. at para. 21.

the Enforcement Bureau develop the measures for accepting and reviewing new or updated RMD filings.[9] That is the Commission's job, not the VSP's.[10] Furthermore, many companies redact confidential information in RMD filings to keep bad actors from seeing how a VSP fights illegal calls. This means that other providers could not determine whether the filing complies with Commission rules, making thorough third-party verification practically impossible.[11]

Fifth, the Commission should limit any new KYUP collection and blocking rules to a provider's directly upstream partner. Proposed rule 64.1200(n)(5) refers to "directly upstream" provider, but other provisions may reach further. The result could be liability for a provider concerning an upstream provider for which the provider has no visibility, direct contract with or ability to control.

Similarly, the proposed downstream blocking authority is overbroad, unnecessary and anticompetitive. VSPs already can terminate contracts with upstream providers that transmit illegal calls. Blocking by non-contractual upstream providers gives large carriers gatekeeper power over market access. An "objectively reasonable" standard is insufficient to prevent abuse of this power. The standard is hard to enforce after the fact since the blocked provider may fail before a remedy is available, and there is no due process for providers. The issues that have arisen from overly and erroneously blocking and labeling calls based on a "reasonable analytics" demonstrates the point. Currently, wanted, lawful calls are being blocked or mislabeled with no

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[9] Further Notice of Proposed Rulemaking, WC Docket Nos. 24-213 and 17-97, CG Docket No, 17-59, rel. July 23, 2026, at paras. 68-69 ("RMD Rulemaking").
[10] Similarly, VON does not agree that VSPs should be required to try to ascertain, beyond just a general provision in a contract, whether an upstream provider has mechanisms in place to ensure its own customers and upstream providers comply with federal and state laws and regulations concerning unlawful calls, including any KYC and KYUP requirements established. FNPRM at para. 21. Again, it should be the role of the Commission to ascertain such compliance.
[11] See also, RMD Rulemaking at paras. 62-63.

meaningful recourse. VON sees no reason to expect a different outcome here. And a provider blocked by another VSP with which it has no direct contract has no built-in way to contest the decision, unless the Commission writes that protection into the rule itself.

Existing FCC rules already allow or require blocking in defined situations, such as a provider's failure to file in the RMD database or when the Commission orders the industry not to accept calls from certain providers.[12] There is no legal basis to extend blocking authority more broadly. Expanding provider discretion to block traffic based on subjective KYUP evaluations will inevitably result in blocking legitimate calls and increase the likelihood of anticompetitive conduct.[13]

B. The Commission Cannot Deputize the STI-GA as Its Enforcement Arm or Rulemaking Body

The duty to enforce the Commission's rules resides with the Commission. STIR/SHAKEN and the bodies that oversee implementation, including the STI-GA, were not created to determine the eligibility to offer voice service in the United States. The purpose of STIR/SHAKEN is to attach a verifiable digital signature to a call showing which provider originated it (the "originating service provider," or "OSP") so that enforcement agencies — including the FCC, state attorneys general, and the ITG — can identify that provider and, where appropriate, take enforcement action. The STI-GA, which provides objective token administration, is not intended to act as an enforcement authority, gatekeeper or fact finder, and requiring it to do so, would create confusion and make enforcement more challenging. It was also not established by Congress. It was created in 2018

[12] See 47 CFR § 64.6305(g).

[13] If the Commission adopts the downstream blocking proposal, it must include an adequate and expedient method for blocked providers and the calling parties to appeal and resolve wrongfully blocked calls.

through an industry-led effort and remains a body run by the industry.[14] If the Commission would like to STI-GA to follow Commission rules and act at the Commission's behest, the Commission must establish a third party body and adopt rules governing that body through formal rulemaking, similar to what it has done with the ITG, the Local Number Portability Administrator, and the Universal Service Administrative Company.

C. VON Supports Clarifying Provider Roles and Definitions as Consistent Terminology Reduces Uncertainty

VON supports the Commission's effort to clarify provider roles and terminology in this proceeding. VON urges the Commission to avoid introducing new, proceeding-specific vocabulary, but rather that any definitions it adopts here track the definitions already adopted, or proposed, in the Commission's related dockets. Specifically, definitions adopted in this proceeding, including "voice services" and "reseller" should align with those adopted in the pending Numbering Rulemaking and RMD Rulemaking.[15]

VON also advises against adopting a rigid definition of "facilities-based provider."[16] Advancements in technology will continue to blur the line between facilities-based and non-facilities-based provider types. If the Commission rigidly defines "facilities-based," providers will innovate around the definition to avoid regulation. This could hamper American technological innovation and put American companies at a disadvantage to international players.

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[14] See, https://atis.org/press-releases/secure-telephone-identity-governance-authority-launched-in-major-industry-effort-to-combat-unwanted-robocalling/ (last visited July 30, 2026).
[15] See, infra. Note 3.
[16] FNPRM at para. 93.

D. The Commission Should Codify STIR/SHAKEN Attestation Standards Ensuring the Majority of Voice Providers Remain Call Signers

VON supports codifying STIR/SHAKEN attestation standards because clear, enforceable rules will reduce wrongful attestations, improve analytics outcomes, and protect legitimate third-party signing arrangements. To satisfy attestation criteria, the provider originating the call must maintain an authenticated relationship with the customer. VON recommends against limiting STIR/SHAKEN signing authority to OSPs alone. The Commission proposes limiting that authority to "facilities-based providers," on the theory that a provider must own physical network facilities to sign calls. This is incorrect. Any initiating provider capable of signing its own calls should be permitted, and encouraged, to obtain its own SPC token and sign its own calls directly, rather than being forced to route calls through specific upstream facilities-based providers.[17] The initiating provider is best positioned to authenticate traffic because it assigns the phone numbers, monitors calling patterns and has commercial incentives to prevent fraudulent use of its service. Requiring it to hold its own SPC token also means it goes through the same vetting the STI-GA applies to every other token holder and ensures that the actual SPC token holder maintains direct responsibility and accountability for illegal traffic. This also keeps the call transparent. Today, when an initiating provider signs a call, the terminating provider can see who the initiating provider is. That visibility would disappear if only originating providers could sign calls, especially

[17] "Initiation" is the action performed by a voice service customer in commencing a call; it does not include origination. "Initiating provider" is a VSP that performs initiation for its end users' calls (i.e., a non-facilities-based provider serving end users directly). In the case of a UCaaS provider, the call initiates on the UCaaS provider's point of presence; the UCaaS provider puts in the SIP header and the information necessary to send the call to the called party, including STIR/SHAKEN information and signs the call before passing it to the wholesale carrier, who puts the call on the PSTN and delivers it to the called party's terminating carrier.

since delegated certificates are not yet widely adopted and in some cases not offered at all. The Commission should therefore allow both initiating and originating providers to sign calls.

Finally, instead of creating different treatment for foreign-originated traffic, the Commission should encourage the growth of the STIR/SHAKEN ecosystem by supporting cross-border STIR/SHAKEN. The Cross-Border Call Authentication ("CBCA") group has tested and is rolling out an international STIR/SHAKEN framework to authenticate foreign-originated traffic and ensure that these calls are signed and verified to the same extent as domestic calling.[18] The CBCA will help ensure that global players remain connected to the American market and that American ideas and business continue to have a prominent role in the world economy.

E. The Commission Should Not Block Calls Routed Over the Old Phone Network Until the Shift to Internet-Based Calling Is Complete

VON supports measures that encourage calls to travel over authenticated internet ("IP") paths and that permit targeted blocking of unauthenticated SIP traffic tied to demonstrated bad actors. However, any Commission decision to require blocking of unauthenticated calls more broadly should wait until the industry finishes the transition to all IP-based calling and the Commission confirms that no legitimate calls are still passing through TDM switches, where STIR/SHAKEN signing is not possible. Otherwise, even well-intentioned blocking rules will suppress lawful, wanted calls with no practical remedy for the parties harmed.[19]

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[18] See, https://atis.org/press-releases/atis-iconectiv-trial-industry-robocall-initiative-with-bandwidth-microsoft-to-mitigate-unwanted-robocalls-globally/ (last visited August 5, 2026).

[19] Notwithstanding, any blocking mandate, if adopted, must include a clear safe harbor for good-faith implementation, ongoing error monitoring, sufficient information sharing, and a defined, timely process for a calling party to demonstrate that its calls were wrongfully blocked and to have that blocking corrected. Without adequate recourse, even well-intentioned blocking rules will suppress lawful, wanted calls with no practical remedy for the parties harmed.

F. The Commission Should Pre-Empt Conflicting State Laws

VON supports preemption of state requirements in the field of caller ID authentication, to prevent state rules that conflict with the Commission's own rules, creating one consistent foundation for both federal and state enforcement. The goal of the Commission is to work with industry and reduce fraud and abuse on the voice network, not needlessly dedicate finite VSP resources to overlapping and possibly conflicting compliance obligations. This will spare VSPs the cost and burden of complying with different, conflicting requirements in different states.[20]

G. The Commission Should Adopt a Safe Harbor and Consider the Safe Harbor in Enforcement Proceedings

Establishing a safe harbor is one of the most impactful steps the Commission can take. Under the voluntary framework, VSPs that choose to implement heightened verification procedures above the baseline KYUP and engage in active traffic monitor could freely share confidential fraud intelligence without fear the data might trigger regulatory scrutiny or fines.[21] Safe Harbors should be technology neutral, judged by outcomes and documented processes rather than by whether a provider used a specific vendor's one particular commercial solution.

A safe harbor will encourage broad industry compliance without fear of protracted enforcement proceedings, and should also help deter meritless lawsuits, including class actions. Providing assurances for good faith information sharing would remove a significant practical barrier to cooperation. Because bad actors are relentless in circumventing established safeguards, this collaborative approach ensures that enforcement remains focused on true bad actors rather than penalizing operators making reasonable, good faith efforts to protect the voice ecosystem.

[20] FNPRM at para. 132.
[21] FNPRM at para. 40.

Accordingly, VON strongly opposes the proposed $2,500 per-call base forfeiture for KYUP violations.[22] This penalty is disproportionate in high-volume UCaaS/CCaaS contexts and risks existential liability for administrative errors. Instead, the Commission should calculate penalties per account or per infraction, considering safe harbor adherence and remediation speed. At minimum, any per-call penalty must be limited to calls resulting in actual fraud or deception, rather than applying it to every single call placed on a provider's network during a period of deemed non-compliance.

H. Compliance Timelines, Definitions and Other Rulemakings

With respect to implementation timelines, VON recommends that the Commission apply any new rules prospectively to new customers after a reasonable implementation period (e.g., at least 12 months after OMB approval of the new requirements). Updating existing KYUP processes will require significant time to plan and execute complex engineering changes, as well as to educate customers on the new requirements.

Moreover, these new KYUP requirements cannot be evaluated in a vacuum. They must be considered alongside an expanding web of concurrent FCC proposals regarding new KYC mandates,[23] strengthened RMD obligations,[24] restrictions on number resale,[25] and heightened scrutiny of offshore operations and foreign carriers.[26] Rather than issuing piecemeal orders across these various proceedings, the Commission should issue an omnibus NPRM that lets industry and other interested parties comment holistically on the broader framework. This

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[22] FNPRM at para. 131.
[23] See, Comments of the Voice on the Net Coalition, CG Docket No. 17-59, filed June 25, 2026.
[24] Further Notice of Proposed Rulemaking, WC Docket No. 24-213, released July 23, 2026 ("RMD Rulemaking").
[25] See, Comments of the Voice on the Net Coalition, WC Docket No. 26-49, filed June 8, 2026 ("Numbering NPRM").
[26] See, Comments of the Voice on the Net Coalition, WC Docket No. 26-82, filed June 8, 2026.

comprehensive approach would ensure definitional and operational consistency, along with realistic implementation timeframes while avoiding excessive, interlocking rules that will be difficult to administer or require Commission waivers if they cannot be administered, rather than targeting the specific bad actors driving the problem.

III. CONCLUSION

For the reasons discussed above, VON urges the Commission to adopt technology-neutral, industry-wide, risk-based KYUP standards, paired with clear safe harbors and proportional, administrable enforcement rules. These steps will strengthen protections against illegal calls while preserving innovation, competition, and lawful communications.

Respectfully submitted,

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