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

In the Matter of

Improving the Effectiveness of the Robocall Mitigation Database	)	WC Docket No. 24-213
Call Authentication Trust Anchor	)	WC Docket No. 17-97
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59

REPLY COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net ("VON") Coalition[1] hereby submits these reply comments in response to the Comments of USTelecom filed in the in the above-referenced dockets.[2] VON broadly agrees with USTelecom that the Robocall Mitigation Database ("RMD") should serve as the source of truth about which voice service providers ("VSP") are allowed to send and receive calls via the public switched telephone number. VON objects, however, to USTelecom's suggestion that VSPs should have broad discretion to use "other reliable information" to "refuse, discontinue, block, or label traffic where credible information warrants action even, if the upstream provider remains listed" in the RMD.[3] Such unchecked discretion is inconsistent with

[1] In its initial comments, VON recommended nine steps the Commission should adopt to improve the effectiveness of the Robocall Mitigation Database ("RMD"). Comments of the Voice on the Net Coalition, WC Docket Nos. 24-213 and 17-97 and CG Docket No. 17-59 (filed October 9, 2026).
[2] Comments of USTelecom, WC Docket Nos. 24-213 and 17-97 and CG Docket No. 17-59 (filed October 9, 2026).
[3] Id. at 14. USTelecom also asked the FCC to provide clear protection from liability for "objectively reasonable, good faith blocking decision so that providers can act on credible evidence of illegal traffic." Id.

FCC rules, will encourage anticompetitive conduct and will result in the blocking of legitimate calls and callers.

To date, the Commission allows VSPs to block specific calls based on reasonable analytics. This is the one instance that VSPs can block based on their own outside information. Critically, for calls blocked based on carrier analytics, the FCC requires that the blocking VSP provide the calling party with notice using SIP code 603+, and the opportunity for redress through a clear and transparent mechanism to resolve false positives.[4]

VSPs can only block all calls from a specific provider when that provider is not in RMD[5] or following notice from the Enforcement Bureau that a VSP has been transmitting suspected illegal traffic and has failed to mitigate such traffic.[6]

USTelecom's ask is to broadly expand individual VSPs power to rely on non-public information to block all providers' traffic, not just specific calls, without providing any opportunity for wrongly blocked carriers to seek redress. In particular, USTelecom suggests that "other reliable information" VSPs could use to refuse traffic from other VSPs would include not only analytics but traceback information (which by itself provides no determination of illegal traffic and is not available to all VSPs on an equal basis), traffic patterns, and other undefined "risk indicators." The Commission cannot and must not permit VSPs unfettered discretion to refuse traffic based on these amorphous concepts, particularly from those downstream VSPs with whom the originating VSP has no contractual relationship.

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[4] Eighth Report and Order, CG Docket No. 17-59 (rel. Feb. 28, 2025) at paras. 15-18 and 47 CFR § 64.1200(k)(9). As is clear in other proceedings, the current redress process is difficult to manage and many customers are harmed while waiting for the redress process to play out.
[5] 47 CFR § 64.6305(g).
[6] 47 CFR § 64.1200(k)(4).

VON agrees that the Commission should better assess RMD filings and that the RMD should be in the single source of truth about which VSPs can make and receive calls to the PSTN. Individual VSPs should not be able to upend the Commission's determination that a VSP belongs in the RMD and the voice calling ecosystem based on unknown information and risk factors. Instead, VSPs should only be allowed to block traffic upon notice from the Commission, as is the current practice.

Respectfully submitted,

VOICE ON THE NET COALITION

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