



1825 EYE ST. N. W., SUITE 900
WASHINGTON, D.C. 20006
TELEPHONE 202-457-0160
FACSIMILE: 844-670-6009
<http://www.dickinsonwright.com>

GLENN S. RICHARDS
GRichards@dickinsonwright.com
202-466-5954

May 9, 2025

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Advanced Methods to Target and Eliminate Unlawful Robocalls – CG Docket 17-59
Call Authentication Trust Anchor – WC Docket 17-97
Targeting and Eliminating Unlawful Text Messages – CG Docket 21-402
Numbering Policies for Modern Communications – WC Docket 13-97
Telephone Number Requirements for IP-Enabled Service Providers – WC Docket 07-243
Implementation of TRACED Act Section 6(a) – knowledge of Customers by Entities with Access to Numbering Resources – WC Docket 20-67
Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership – IB Docket 16-155

Dear Ms. Dortch:

On May 7, 2025, the Voice on the Net Coalition (VON)¹ met with Commission legal advisors and staff (see Attachment A) and discussed, among other issues, VON's filings in the above-referenced proceedings.

Both in comments filed in the FCC's robocall dockets and as a member of the STIGA Board of Directors, VON has been supportive of Commission and industry efforts to broadly adopt STIR/SHAKEN and reduce illegal traffic. VON described four issues that remain unresolved.

First, as described more fully in a recent ex parte,² VON is concerned about the lack of clarity around the Know Your Customer (KYC) obligations and the potential for significant fines for violations of what is obviously a vague standard. Specific KYC

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 VON and Cloud Communications Alliance letter to Marlene Dortch, FCC Secretary, CG Docket No. 17-59 (filed March 10, 2025).

obligations cannot be defined through enforcement actions. In a recent NAL, the Commission cited the Lingo consent decree³ as a basis for imposing liability. This is in direct contravention of notice and comment requirements. Instead, VON recommended that the FCC make clear that forfeitures may only be imposed when a voice service provider has actual knowledge of the illegal traffic and has failed to mitigate that traffic. Without this clarification, providers acting in good faith could be subject to substantial fines.

Second, while VON is somewhat encouraged by the recent adoption of the NPRM regarding call authentication for non-IP networks,⁴ it remains concerned about the large number of calls that are signed by originating carriers but unsigned at termination as they make their way through a call chain that includes non-IP networks. VON questions whether any solution that allows providers to delay transitions to all-IP networks will delay efforts to mitigate illegal traffic and also impair the nationwide transition to NG911 and encourage a system of unnecessary charges in the ecosystem. Therefore, VON recommended that the FCC strongly encourage voice service providers to upgrade their networks to all-IP.

Third, VON has lingering concerns about wrongful blocking and mislabeling of lawful traffic. VON did not support the adoption of 603+ as the required SIP Code for notification to calling parties that a call has been blocked based on analytics. VON recommended the continuing use and development of SIP Code 608 – which we believe should have been permitted along with 603+. That said, VON members are working with industry to develop solutions and redress options to make sure callers can be reached and encouraged the Commission not to extend the deadline to implement 603+. VON is hopeful these efforts will be fruitful but may come back to the Commission if those responsible for the blocking and mislabeling of lawful and wanted calls only propose solutions that unnecessarily increase the costs of providing services.

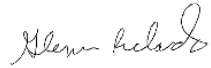
Finally, VON recommended that the Commission not adopt proposed restrictions on interconnected VoIP providers direct access to telephone numbers as the proposed rules would have an anticompetitive impact and would not reduce the number of illegal robocalls. Any new obligations should apply equally across the industry, regardless of technology. VON noted that while the common narrative suggests that interconnected VoIP providers are primarily responsible for robocall traffic, publicly available data from the Industry Traceback Group suggests that traditional service providers, including wireless providers, are far more likely to have tracebacks than interconnected VoIP providers, including VON members.

³ Lingo Telecom, LLC Order, File No.: EB-TCD-24-00036425, Consent Decree, Attachment 1, Operating Procedures (rel. August 21, 2024).

⁴ Notice of Proposed Rulemaking, WC Docket 17-97 (rel. April 29, 2025).

Please contact the undersigned if you have any questions. Copies of this letter have been emailed to the FCC personnel listed on Attachment A.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Glenn Richards".

Glenn S. Richards
Counsel to the Voice on the Net Coalition

ATTACHMENT A

1) Meeting with Thomas Struble, Senior Legal Advisor to Commissioner Simington
VON attendees: Paula Boyd, Microsoft; Anne Bowling and Rachel Petty, RingCentral;
John Murphy, Nextiva; Jennifer Best Vickers, Twilio; Olive Morris, Telnyx; Brendan
Kasper, 8X8 and Glenn Richards, Dickinson Wright.

2) Meeting with Edyael Casaperalta, Legal Advisor; Jonathan Uriarte, Strategic
Communications and Policy Advisor; and Harsha Mudaliar, Policy Advisor and External
Affairs Liaison, office of Commissioner Gomez.
VON attendees: Anne Bowling and Rachel Petty, RingCentral; John Murphy, Nextiva;
Jennifer Best Vickers, Twilio; Olive Morris, Telnyx; Brendan Kasper, 8X8 and Glenn
Richards, Dickinson Wright.

3) Meeting with Joseph Calascione, Lisa Zaina, Jodie Griffin, Cara Voth, Molly O'Connor,
Connor Ferraro, Jodie May, Chris Laughlin, Michele Berlove, Melissa Kinkel, Jordan
Reth, Jesse Goodwin, Christi Shewman and Jonathan Lechter of the Wireline
Competition Bureau, and Jerusha Burnett, Consumer and Governmental Affairs Bureau.
VON attendees: Anne Bowling and Rachel Petty, RingCentral; John Murphy, Nextiva;
Jennifer Best Vickers, Twilio; Olive Morris, Telnyx; Brendan Kasper, 8X8 and Glenn
Richards, Dickinson Wright.