

**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
	)	

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net (“VON”) Coalition¹ hereby submits these comments in response to the Further Notice of Proposed Rulemaking (“FNPRM”) in the above-referenced dockets regarding proposed modifications to the regulations governing filings by voice service providers (“VSPs”) in the robocall mitigation database (“RMD”).² As discussed below, VON recommends several changes to make the RMD filing process more transparent and efficient, and that will make the RMD a more useful source of information for consumers, regulators and other VSPs. In addition, VON recommends that the Commission consolidate the pending robocall-related proceedings to issue one set of sensible, consistent and effective rules.³

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 *Further Notice of Proposed Rulemaking*, WC Docket Nos. 24-213 and 17-97 and CG Docket No. 17-59, FCC 26-49 (rel. July 23, 2026); see also 91 Fed. Reg. 57454 (September 9, 2026) (establishing a comment date of October 9, 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

BACKGROUND

According to the PN, the purpose of this proceeding is to improve the effectiveness of the RMD by proposing measures to strengthen filing obligations and to deter bad actors and non-compliant providers from entering or remaining in the RMD.⁴ Proposals include clarifying which entities are VSPs and must file in the RMD, the applicability to foreign VSPs, the use of third parties to file in the RMD, potential modifications of the information and certifications that should accompany RMD and robocall mitigation plan filings (and whether any of the information should not be accessible to the public); requirements to file updates and recertifications; ways to keep bad actors out of the RMD or to remove them from the RMD; proposed RMD compliance audit requirements; and compliance dates if new rules are adopted.

DISCUSSION

VON appreciates the importance of the RMD as a central tool in the Commission's efforts to stop illegal calls by promoting transparency and accountability for providers' robocall mitigation practices. A number of the proposals in the FNPRM, while well-intentioned, may impose costs and burdens that outweigh any perceived benefits. VON makes the following nine recommendations that will make the RMD filing process more efficient and transparent, and a more useful source of information for regulators, consumers and other VSPs.

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, rel. May 1, 2026); the KYUP FNPRM, proposing new rules for onboarding upstream providers; and development of a new robocall mitigation scorecard (Public Notice, CG Docket No. 26-239, rel. September 2, 2026).

⁴ FNPRM at para. 2.

1. **Address immaterial, administrative changes.** Under existing rules, VSPs are obligated to update RMD filings within 10 business days of and change in the information submitted.⁵ VON recommends that changes to an RMD filing that are limited to minor administrative changes not impacting the VSPs robocall mitigation plans or procedures should not be subject to the 10 day window and potential enforcement. For example, changes in titles of executives. Minor changes should either be required to be filed within 30 days, or as part of the annual recertification process. This becomes more critical should the Commission adopt more granular information filing obligations, including regarding company ownership and affiliates, where such changes will have no impact on the VSPs provision of service or its commitment to deterring illegal robocalls. Filers that miss these minor change update windows (many of which are simply administrative oversights) should not be subject to automatic RMD removal or suspension, or enforcement action.
2. **Permit consolidated/cross-referenced submission of common programs and entities.** As the Commission finds benefits in requiring parents, affiliates, and subsidiaries that independently meet the definition of a “voice service provider” to each make a separate filing in the RMD, there are practical considerations for permitting consolidated or cross-referenced submissions for common programs while accurately identifying accountable entities. RMD filers with multiple entities should be able to identify shared robocall mitigation controls and programs while accurately identifying the accountable entities. This is especially relevant in the expansion STIR/SHAKEN in cross-border scenarios where a parent entity should be incentivized to adopt a global approach to call authentication.

⁵ Id. at para. 64.

3. **Do not permit blocking of text messages.** The Commission should clarify that the RMD is limited to voice services and does not impact SMS/MMS services or other service providers.⁶ There are several reasons why: robocalling is a voice service problem. SMS/MMS is an information service and subject to a different regulatory regime. Moreover, SMS/MMS are governed by a self-regulatory regime administered by the wireless industry and there is no reason to disturb that environment. In addition, there may be over-the-top text messaging service providers who do not otherwise offer voice services and would not necessarily be required to file in the RMD, whose messages could or may be blocked if this proposal were adopted.
4. **Clarifying which providers are subject to RMD filing obligations.** The Commission should not move forward with its proposal to vastly expand the definition of "Voice Service Provider" for purposes of which entities are required to file in the RMD. For example, entities that provide PBXs, dialing platforms, cloud services, over-the-top services, call centers, and other value-added services but do not provide the underlying interconnected PSTN service are not "Voice Service Providers" and should not be subject to RMD filing requirements.⁷

The FCC proposes requiring a vast swath of companies to file in the RMD as a type of repository of companies that are allowed to sell voice services that use telephone numbers to end users. While VON appreciates the FCC's apparent desire to increase transparency and accountability, the FCC's proposal could very well have the opposite effect. Currently, the RMD includes nearly 11,000 filings, many of which are not VSPs under the Commission's existing definition because they are not providing the PSTN-connected service, and are filing for

⁶ Id. at para. 188 (seeking comment on whether providers should be required or permitted to block text traffic from providers not listed in or that have been removed from the RMD).

⁷ Id. at para. 14.

cautionary reasons. The Commission’s proposal would likely cause thousands of companies to file out of an abundance of caution and create less transparency into which companies may be responsible for illegal calling patterns.

VON recommends that there should be a clear link between VSPs that provide voice services to the public and entities that file in the RMD. The FCC should rely on preexisting, objective filing requirements (such as, for example, FCC Form 477 and 499 filers amongst others) to determine which providers are subject to the RMD filing and compliance obligations. That way, the RMD would contain only those companies ultimately responsible for monitoring network traffic and stopping bad actors who misuse the network.

Specifically, when a customer brings their own PSTN service to a software solution, there should be no RMD filing obligation for the software solution or the integrated service. Imposing an RMD obligation creates a technical inconsistency because the software solution does not directly connect to the PSTN and cannot monitor traffic. Furthermore, these services cannot facilitate a traceback, and imposing redundant RMD filing obligations on entities providing PBXs, dialing platforms, cloud services, over-the-top services, call centers, and other value-added services will not assist the FCC in achieving its goals of preventing and stopping illegal calls.⁸

5. **Identifying foreign service providers.** The Commission should require the disclosure of foreign ownership of VSPs that file in the RMD filer, including the ultimate beneficial owner (UBO). Domestic entities providing voice services that are affiliated with or controlled by a foreign

⁸ These services are distinguishable from Tin Can’s “Party Line Plan” VoIP service. While the Commission determined that the service does not meet the definition of “interconnected VOIP service” the Commission and Tin Can both acknowledge that the service does provide some connectivity to the PSTN and that Tin Can has voluntarily committed to file in the RMD. See, Declaratory Ruling, *Far Homes, Inc. d/b/a Tin Can, Petition for Declaratory Ruling*, WC Docket 25-288 (rel. September 30, 2026).

interests should disclose those interests in the RMD filing and be subject to additional scrutiny. This will help identify those VSPs that may not have bona fide business operations in the United States. The Commission may solicit comments or suggestions from other government agencies, programs, and industries that scrutinize market participants or licensees to accurately determine foreign affiliation, including export control and sanctions tools.

6. **Revise certification requirements.** VON supports the Commission proposal to revise the first certification to simply require that a VSP certify that it is not presently prohibited from filing in the RMD, rather than disclose enforcement actions in the past two years, regardless of status.⁹ This change will provide filers with an incentive to rapidly resolve any complaints or deficiencies. resolves the contradiction regarding prior actions or investigations and recognizes that providers may be permitted by the Commission in certain circumstances to file in the RMD after they have been removed. This will deter providers from refileing when they are not permitted to do so.

7. **Financial surety.** The Commission should not require all VSPs that file in the RMD to obtain and submit a standby letter of credit or other financial instrument meeting certain capital requirements.¹⁰ This new requirement, if adopted, should be used sparingly as a remedy or surety for filers that have raised concerns or have been the subject of enforcement actions. For example, VSPs seeking to regain entry into the RMD after being suspended. There is nothing to suggest that a VSPs ability to obtain a required financial instrument is somehow related to whether that VSPs is more likely or not to engage in illegal robocalling.

⁹ Id. at para. 34.

¹⁰ Id. at paras. 70-73.

8. **RMD removal process.** The Commission should not adopt a one-step removal process for egregious conduct or circumstances.¹¹ Removal from the RMD suspends the VSP's voice business in the United States (as well as the business of its resellers, if any), and every filer should have a one-time warning before their voice business is suspended or terminated. The Commission should also distinguish between removal for cause and removal for administrative non-compliance. In the latter instance, the Commission provides the VSP, after receiving notice, an opportunity with a reasonable amount of time to address the issue, coordinate with other providers as needed, and come into compliance before suspension or removal.

9. **Information sharing.** The Commission should share with states attorneys general when a VSP has been removed from the RMD for cause. The Commission should also maintain on its website a publicly available list of entities removed from the RMD in order for other VSPs to have the ability to check or confirm RMD status before onboarding or handling their traffic. This would create a double check – whether a VSP is in the RMD and/or whether it is on the removed list. Similarly, the Commission should also list those VSPs that have been reinstated following removal from the RMD.

¹¹ Id. at para. 85.

CONCLUSION

For the reasons discussed above, VON urges the Commission to act in accordance with the recommendations herein to improve the RMD filing process.

Respectfully submitted,

VOICE ON THE NET COALITION

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